452-41

DEPARTMENT OF THE ARMY
US ARMY TOXIC AND HAZARDOUS MATERIALS AGENCY
ABERDEEN PROVING GROUND, MARYLAND 21010-5401

REPLY TO ATTENTION OF

CETHA-IR-P (50-6c)

21 MAY 1992

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Defense Environmental Restoration Program (DERP) Installation Action Plans

1. Reference:

a. Memorandum, DASA, ESOH, 24 Feb 92, subject: Defense Environmental Restoration Sites Validation and Installation Action Plans.

b. Memorandum, HQDA, ENVR-EH, 9 Mar 92, subject: Defense Environmental Restoration Program Sites Validation and Installation Action Plans.

2. The referenced memorandums directs the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) to develop a format and program for preparation and review of installation level action plans for the Active Site Installation Restoration Program (IRP). The Installation Action Plans (IAPs) will be forwarded to the Army Environmental Office (AEO) by USATHAMA for submission to the Office of the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health).

3. An information paper providing facts on the IAPs is provided as enclosure 1.

4. Provided as enclosure 2 is a list of forty-two installations that will require IAPs.

5. Guidance and procedure is available for the preparation of the IAP (encl 3).

6. The lead Executing Agency of the IRP for each installation will prepare the IAP in coordination with the installation. Installations conducting their own program should prepare the IAP. The installation should submit the IAP to the Program Management Branch of USATHAMA by 15 Jul 92.

CETHA-IR-P 21 MAY 1992
SUBJECT: Defense Environmental Restoration Program (DERP) Installation Action Plans

7. For additional information and assistance, the point of contact is Ms. Karen Wilson, DSN 584-1542 or commercial (410) 671-1542.

FOR THE COMMANDER:

Robert J York

3 Encls
as

ROBERT J. YORK
Chief
Installation Restoration Division

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SUBJECT: Defense Environmental Restoration Program (DERP) Installation Action Plans

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PROGRAM MANAGER FOR ROCKY MOUNTAIN ARSENAL, ATTN: AMXRM-ERP (MR. BRIAN ANDERSON), COMMERCE CITY, CO 80022-2180

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US ARMY TOXIC AND HAZARDOUS MATERIALS AGENCY
ABERDEEN PROVING GROUND, MARYLAND 21010-5401

REPLY TO
ATTENTION OF
CETHA-IR-P (50-6c)

21 May 92

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Preparation of Active Army Defense Environmental Restoration Program Installation Action Plans -- INFORMATION PAPER

1. **PURPOSE:** This paper provides information concerning the need for preparation of Installation Action Plans to identify possible early response actions for major installation restoration programs.

2. **RECOMMENDED USE:** Forty-two installations have been selected for the preparation of Installation Action Plans. The intended audience for this information are Installation Restoration Program Environmental Coordinators.

3. **INFORMATION:**

a. The Deputy Assistant Secretary of the Army for the Environment, Safety and Occupational Health (DASA(ESOH)) has identified that the Army has less environmental projects in the Remedial Action (RA) phase under the Defense Environmental Restoration Program (DERP) than other DOD services.

b. The Army would like to move DERP projects into the RA phase as soon as possible.

c. The Army needs to place increased emphasis on the identification, programming and execution of response actions that can be considered remedial actions.

d. In response to these identified needs an Installation Action Plan (IAP) is to be prepared for selected installations and submitted to the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) for transmittal to the DASA(ESOH) by 15 Sep 92.

e. This Agency has been requested to develop a program for preparation and review of IAPs for active Army installations by the Army Environmental Office.

f. Guidance and procedures for preparation of IAPs has been prepared by the Installation Restoration Division (IRD) of USATHAMA and will be distributed in coordination with this Information Paper.

Encl1

g. These IAPs will include a short chronological installation history of contamination studies, sites and contaminants of concern, response actions taken, a schedule of future milestones, associated cost estimates and identify possible/future response actions.

h. The IAPs will be completed for all Army installations on the National Priorities List (NPL), installations with off-post or suspected off-post contamination, installations with over $1.0 million of funded projects in the FY92 IRP Work Plan, selected installations near high population densities and those with high political sensitivities.

i. Installations will be responsible for submitting a completed IAP to USATHAMA for review by 15 Jul 92.

4. **COORDINATION:**

CETHA-IR-P Concur/~~Nonconcur~~ R. Turkeltaub (Mr. Robert Turkeltaub)
Date 5/27/92

CETHA-IR Concur/~~Nonconcur~~ Joseph E. King Jr. (Dr. Robert J. York)
Date 5/27/92

5. **APPROVAL:** Commander, USATHAMA, approved this paper.

Karen Wilson
KAREN WILSON
Environmental Scientist
Program Management Branch

Level
(1) Public Document
(2) 36 MOUNTH = MAY 05

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U.S. Army Laboratory Command, ATTN: AMSLC-RK (Mr. Thomas Bower), 2800 Powder Mill Road, Adelphi, MD 20783-1145

INSTALLATIONS FOR DEVELOPMENT OF ACTIVE SITES ACTION PLANS

Priority for the development of action plans at active sites is: a. National Priorities List (NPL) installations; b. installations with off-post or suspected off-post contamination; installations with over $1.0 million in funded projects in the FY92 IRP workplan; and d. installations near high population densities and those with high political sensitivites.

NATIONAL PRIORITIES LIST INSTALLATIONS

MAJOR COMMAND	INSTALLATION	EXECUTING AGENCY	PROGRAM
AMC	Aberdeen Proving Ground	INSTALL	IR
AMC	Anniston Army Depot	THAMA	IR
AMC	Cornhusker	THAMA	IR
AMC	Iowa AAP	THAMA	IR
AMC	Joliet AAP	THAMA	IR
AMC	Lake City AAP	THAMA	IR
AMC	Letterkenny Army Depot	THAMA	IR
AMC	Lonestar AAP	THAMA	IR
AMC	Longhorn AAP	CEMP	IR
AMC	Louisiana AAP	THAMA	IR
AMC	ARDEC (Picatinny)	THAMA	IR
AMC	Milan AAP	THAMA	IR
AMC	Riverbank AAP	THAMA	IR
AMC	Rocky Mountain Arsenal	INSTALL	IR
AMC	Savanna Army Depot	THAMA	IR
AMC	Seneca Army Depot	CEMP	IR
AMC	Tobyhanna Army Depot	THAMA	IR
AMC	Tooele Army Depot	THAMA	IR
AMC	Twin Cities AAP	THAMA	IR
FORSCOM	Fort Lewis	INSTALL	IR
FORSCOM	Fort Riley	CEMP	IR
FORSCOM	Sudbury Annex	THAMA	IR
USARPAC	Fort Wainwright	INSTALL	IR
USARPAC	Schofield Barracks	THAMA	IR
TRADOC	Fort Dix	THAMA	IR

OTHER HIGH PRIORITY INSTALLATIONS

MAJOR COMMAND	INSTALLATION	EXECUTING AGENCY	PROGRAM
AMC	Badger AAP	THAMA	IR
AMC	Bluegrass Army Depot	CEMP	IR
AMC	Natick R & D Center	THAMA	IR
AMC	Newport AAP	THAMA	IR
AMC	Redstone Arsenal	CEMP	IR
AMC	Volunteer AAP	THAMA	IR
FORSCOM	Fort Campbell	THAMA	IR
FORSCOM	Fort Drum	CEMP	IR
FORSCOM	Fort Gillem	CEMP	IR
USARPAC	Fort Richardson	INSTALL	IR
USARPAC	Fort Shafter	CEMP	IR
TRADOC	Fort Eustis	CEMP	IR
TRADOC	Fort Lee	CEMP	IR
TRADOC	Fort Jackson	CEMP	IR
TRADOC	Fort Story	CEMP	IR
MDW	Fort Myer	CEMP	IR
CE	Cold Regions R & E Lab	THAMA	IR

1. AMC = Army Materiel Command
2. FORSCOM = Forces Command
3. TRADOC = Training and Doctrine Command
4. MDW = Military District of Washington
5. CE = U.S. Army Corps of Engineers
5. INSTALL = Installation
6. THAMA = Corps of Engineers Toxic and Hazardous Materials Agency
7. CEMP = Corps of Engineers Military Programs
8. IR = Installation Restoration
9. BC = Base Closure

ACTIVE SITE INSTALLATION RESTORATION PROGRAM ACTION PLAN

GUIDANCE AND PROCEDURE

1. **PURPOSE:** Provide guidance and procedure for preparation of Installation Action Plans which identify targets of opportunity for early response actions.

2. **REFERENCE:** Enclosure 1 is the general format to be used in the preparation of the Installation Action Plan (IAP). Enclosure 2 is an expanded outline of information to be included in the action plan. Enclosure 3 is an example of a completed IAP.

3. **GUIDANCE:**

a. The Installation Restoration Program (IRP) Executing Agency will prepare the IAP in cooperation with the installation. The installation is responsible for contacting their Executing Agency to prepare the plan. Installations conducting their own program should prepare the IAP. On-site assistance is available as needed from the Program Management Branch, Installation Restoration Division of USATHAMA.

b. Use enclosure 1 for the format of the plan. Enclosure 2 is an outline that can be used as a guide to ensure that all necessary information is included in the plan. Review enclosure 3 for an example of a completed IAP.

c. Place emphasis on: the identification of remedial action (RA) schedules; increased use of interim remedial actions; more accurate accounting and reporting of RAs; the identification, programming and execution of response actions that can be considered RAs; and the identification of innovative means to speed up the study process to allow more timely RAs.

d. It is highly recommended that the Executing Agency and installation, along with any necessary personnel from USATHAMA, the U. S. Army Environmental Hygiene Agency (USAEHA), or Corps of Engineers Districts visit every Defense Environmental Restoration Program Management Information System (DERPMIS) site on an installation to assess the potential for removal actions in development of the IAP.

e. Sites addressed in the IAP will be validated DERPMIS sites: therefore action plan development should be closely coordinated with DERPMIS site validation. As DERPMIS is updated, note information required for incorporation in the IAP.

f. If the Executing Agency is not to be involved in the DERPMIS site validation, updated DERPMIS information should be provided to the Executing Agency as soon as it is available.

Encl 2

4. **PROCEDURE:**

a. After the Executing Agency has prepared the IAP, the installation should review the plan for accuracy.

b. The installation will be responsible for submitting the completed plan to USATHAMA by 15 July 92 with a copy furnished to their major command.

c. Action Plans should be mailed to:

Commander,
U.S. Army Toxic and Hazardous Materials Agency
ATTN: CETHA-IR-P (Ms. Karen Wilson)
Aberdeen Proving Ground, MD 21010-5401

FAX: (410) 671-1548

d. If the IAP was prepared using WORDPERFECT 5.1, please include computer files of the IAP along with the hardcopy. Any changes made to the IAP during review for consistency will be coordinated with the installation by Ms. Karen Wilson, USATHAMA Program Management Branch.

e. Point of contact at USATHAMA is Ms. Karen Wilson, DSN 584-1542 or commercial (410)671-1542.

INSTALLATION ACTION PLAN FORMAT

1. **INSTALLATION INFORMATION** (General) **Not to Exceed (NTE) 1 page**
   (bulleted style to include)
   - -Installation Locale
   - -Command Organization
   - -Lead Executing IRP Agency
   - -Regulator Participation
   - -Priority for Action Plan Development

2. **INSTALLATION DESCRIPTION** **NTE 2 pages**
   - -Current Activity Status
   - -Historic Activity Information
   - -Regulatory Status

3. **CONTAMINATION ASSESSMENT** (excluding summary chart) **NTE 8 pages**
   - -Studies to date
   - -Total number of validated DERPMIS sites
   - -Site descriptions to include
     - --identification by DERPMIS number and name
     - --site type and clustering by site type when practical
     - --contaminants of concern
     - --media of concern
     - --current IRP phase and any REM/IRA/RA
     - --future IRP phase any possible REM/IRA/RA

4. **IRP SITE SUMMARY CHART**
   - DERPMIS number
   - Contaminants of concern
   - Current Phase of IRP
   - REMs/IRAs/Ras to date
   - DPM score (if available)
   - future IRP phase and any possible REM/IRA/RA

5. **SCHEDULE TO COMPLETION** (Assume DERP 2000 goal) **NTE 2 pages**
   - start date of IRP at installation
   - past phase completion milestones
   - projected phase completion milestones
   - IAG/FFA driven milestones

6. **COST ESTIMATES (Include Tables)** **NTE 2 pages**
   - -by phase
   - -by fiscal year

7. **SUMMARY OF REMOVAL ACTION ASSESSMENT EVALUATION** **NTE 2 pages**
   - identify sites/clusters that have been assessed
   - identify past REM/IRA/RA/LTM per site/clusters
   - identify future REM/IRA/RA/LTM opportunities
   - identify innovative means to expedite study process to RA phase

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to Enc

INSTALLATION ACTION PLAN OUTLINE

I. **INSTALLATION INFORMATION**
- 1. Installation Locale
  - A. City, County and State
    - a. approximate situation to high population densities
  - B. Size (in acres)
- 2. Command Organization
  - A. Major Command and Subcommand, if applicable
    - a. identification of organization within commands responsible for IRP
  - B. Installation
    - a. identification of organization within installation responsible for IRP
- 3. Lead Executing IRP Agency
  - A. Investigation Phase Executing Agency
  - B. Remedial Action Phase Executing Agency
- 4. Regulator Participation
  - A. Federal
    - a. identification of regulating EPA region & branch
  - B. State
    - a. identification of regulating State agency
- 5. Priority for Action Plan Development
  - A. NPL installation/site
  - B. Off-post or suspected off-post contamination
  - C. Over $1 million dollar FY92 identified/funded projects
  - D. Close to high population densities
  - E. High political sensitivity

II. **INSTALLATION DESCRIPTION**
- 1. Current
  - A. Active/Inactive
  - B. Scheduled for Closure
- 2. Historic
  - A. When Opened
  - B. Purpose of Installation
    - a. ammunition production
    - b. training
    - c. information systems, etc...
  - C. Periods of Inactivity
  - D. Major Tenant Operations
    - a. history
    - b. type of operation
- 3. Regulatory Status
  - A. Lead Regulator
    - a. USEPA
    - b. State
    - c. multiple

E. 1 ~
to E. 1 3

B. Regulatory Driver
   a. NPL with IAG/FFA
      --include site versus installation if applicable
   b. NPL without approved IAG
   c. Non-NPL with Corrective Action from Part B Permit
   d. Non-NPL with Notice of Violation, etc...

III. **CONTAMINATION ASSESSMENT**

1. Studies to date
   A. History of environmental restoration studies
2. Total number of validated DERPMIS sites
3. Site description (cluster when applicable)
   A. Identification by DERPMIS Number and Name
   B. General Location within Installation
   C. Site type (use DERPMIS as guideline)
      a. past operational discharge
      b. landfill
      c. spill, etc...
   D. Contaminants of Concern (use DERPMIS as guideline)
      a. identification of contaminants
      b. period of contamination
   E. Media of Concern
      a. soil
      b. surface water
      c. ground water
      d. air
      e. multiple
   F. IRP Phase to date
      a. preliminary assessment/site inspection
      b. site investigation
      c. remedial investigation/feasibility study
      d. removal action (REM)
      e. interim remedial action (IRA)
      f. remedial action (RA)
      g. long-term monitoring (LTM)
   G. Future IRP Phase
      a. no further response action planned
      b. next phase expected
      c. anticipated REM/IRA/RA/LTM

IV. **IRP SITE SUMMARY CHART**

1. DERPMIS number
2. Contaminants of concern
3. Current Phase of IRP
4. REMs/IRAs/RAs to date
5. DPM score (if available)
6. Future IRP Phase and Any Possible Recommended REM/IRA/RA/LTM

V. **SCHEDULE** (Assume DERP 2000 goal)
   1. Start Date of IRP at Installation
   2. Past Phase Completion Milestones
   3. Projected Phase Completion Milestones
   4. IAG/FFA Driven Milestones

VI. **COST ESTIMATES**
   1. By Phase
   2. By Fiscal Year

VII. **SUMMARY OF REMOVAL ACTION ASSESSMENT EVALUATION**
   1. Total Sites Assessed Per Site/Clusters
   2. Identify Past REM/IRA/RA/LTM Per Site/Clusters
   3. Identify Future REM/IRA/RA/LTM Opportunities
   4. Identify Innovative Means to Expedite Study Process to RA Phase

May 1992

INSTALLATION ACTION PLAN
FOR
LOUISIANA ARMY AMMUNITION PLANT (LAAP)

1. INSTALLATION INFORMATION

LOCALE

-- LAAP is located approximately 22 miles east of Shreveport, Louisiana on U.S. Highway 80 and consists of 14,974 acres of land, measuring nine miles east to west and three miles north to south. The working population is approximately 1,700 personnel including military, Department of the Army, civilian, and contractor employees; during intense production operation, this number has exceeded 7,000. The area surrounding LAAP is primarily rural with the town of Minden (population 14,697) two miles northeast of LAAP, the village of Doyline (population 896) adjacent to the southern boundary, and the Goodwill community to the north.

COMMAND ORGANIZATION

-- Major Command: U.S. Army Materiel Command, Engineering Housing and Installation Logistics, Environmental Quality

-- Subcommand: U.S. Army Armament, Munitions, and Chemical Command, Environmental Quality

-- Installation: LAAP, Environmental Office

INSTALLATION RESTORATION PROGRAM EXECUTING AGENCY

-- Investigation Phase Executing Agency: U.S. Army Corps of Engineers, Toxic and Hazardous Materials Agency, Installation Restoration Division, Branch B

-- Remedial Design/Action Phase Executing Agency: U.S. Army Corps of Engineers, Ft. Worth District

REGULATOR PARTICIPATION

-- Federal: U.S. Environmental Protection Agency, Region VI

-- State: Louisiana Department of Environmental Quality

PRIORITY FOR INSTALLATION ACTION PLAN DEVELOPMENT

-- NPL Installation

Encl 3

2. INSTALLATION DESCRIPTION

Louisiana Army Ammunition Plant (LAAP) is an active U.S. Army Armament, Munitions and Chemical Command facility under contractual agreement with Thiokol Corporation to manufacture shell metal parts including 155 millimeter projectiles, and to Load-Assemble-Pack (LAP) ammunition items including mortars, mine cleaning line charges, and ADAM projectiles.

The United States (U.S.) government acquired 15,868 acres of land in 1941 for construction of LAAP. Operation began in 1942, with eight ammunition lines and one ammonium nitrate graining plant. During World War II, LAAP was under contract with Silas Mason, Co., producing approximately 65 different ammunition items. In 1945 the plant was placed on standby status.

LAAP was reactivated in February 1951 in support of the Korean conflict. All ammunition loading lines were operational under the responsibility of Remington Rand, Inc. Remington Rand, Inc. also designed a forging and machining plant for manufacturing 155mm projectile metal parts.

Ammunition production was suspended in February 1958 when the plant was again placed on standby status. The plant was reactivated in 1962 in support of the Vietnam conflict with Sperry Rand Corp. the operating contractor. Four production lines were reactivated for classified ammunition items. In 1974 Thiokol Corp. assumed the contract from Sperry Rand Corp and currently operates nine production areas including the metal parts plant.

The Army is investigating these areas for any detrimental environmental impact, by implementing its environmental response authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Superfund Amendments and Reauthorization Act (SARA).

The installation was proposed for the National Priorities List (NPL) in October of 1984 due to groundwater contamination from the Area P Lagoons. LAAP was placed on the NPL with a Hazard Ranking Score of 30.26 in March of 1989; the Defense Priority Score for Fiscal Year 1992 is 23.8. A Federal Facilities Agreement (FFA) was signed by the U.S. Environmental Protection Agency (EPA) Region VI, the Louisiana Department of Environmental Quality (LDEQ), and the Army in February of 1989. This agreement sets deadlines, objectives, responsibilities, and procedural framework for implementing the IRP at LAAP.

3. CONTAMINATION ASSESSMENT

A. INSTALLATION RESTORATION SITES/CONTAMINATION

Past operations at approximately a dozen manufacturing, loading, and support facilities, have resulted in the generation of explosive and metal contaminated waste which was disposed of at several locations on the installation. An initial Installation Assessment, completed in May 1978, indicated heavy explosive contamination in plant loading and disposal areas, and heavy metal contamination in the unlined pond of M-4. Between 1979 and 1980, the U.S. Army Environmental Hygiene Agency investigated the shallow aquifer. The investigation revealed that the shallow aquifer was contaminated with explosive compounds; however, the deepest aquifer, the source of drinking water on and off- post, was not contaminated. In 1982, the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) performed a preliminary environmental survey at LAAP. The survey concluded that significant contamination of the shallow aquifer had occurred in Area P, BG8 Landfill/Lagoon, and LF3. A Remedial Investigation (RI) in 1985 found detectable levels of explosives in four areas and low levels in the monitoring wells at the plant's southern boundary. Following an EPA Region VI site inspection in 1987, LAAP was notified that three more sites were considered Solid Waste Management Units (SWMUs) and would require further investigation. In 1987, an updated RI task indicated that explosive contamination was migrating off of LAAP's southern boundary.

In 1989, a drinking water well monitoring program was established. The public drinking water supply wells closest to LAAP's north and south boundaries as well as LAAP's drinking water wells were sampled once per month for 6 months. Detectable levels of RDX, 2,4-DNT, HMX, tetryl were found for one sampling event; however, the inconsistency of results indicated that contamination was introduced through incorrect field sampling procedures or equipment. Monitoring was continued for another six months; no contamination was found. Although no documented contamination of drinking water wells was found either on- or off-post, the Army is continuing to monitor on a less frequent basis, in agreement with the federal and state regulators.

This thorough investigative history at LAAP has determined that Installation Restoration Program (IRP) efforts should focus on seven areas of concern. These areas are identified as LAAAP-01 through LAAAP-07 in the Defense Environmental Restoration Program Management Information System (DERPMIS) and are delineated on the attached map (Atch 1).

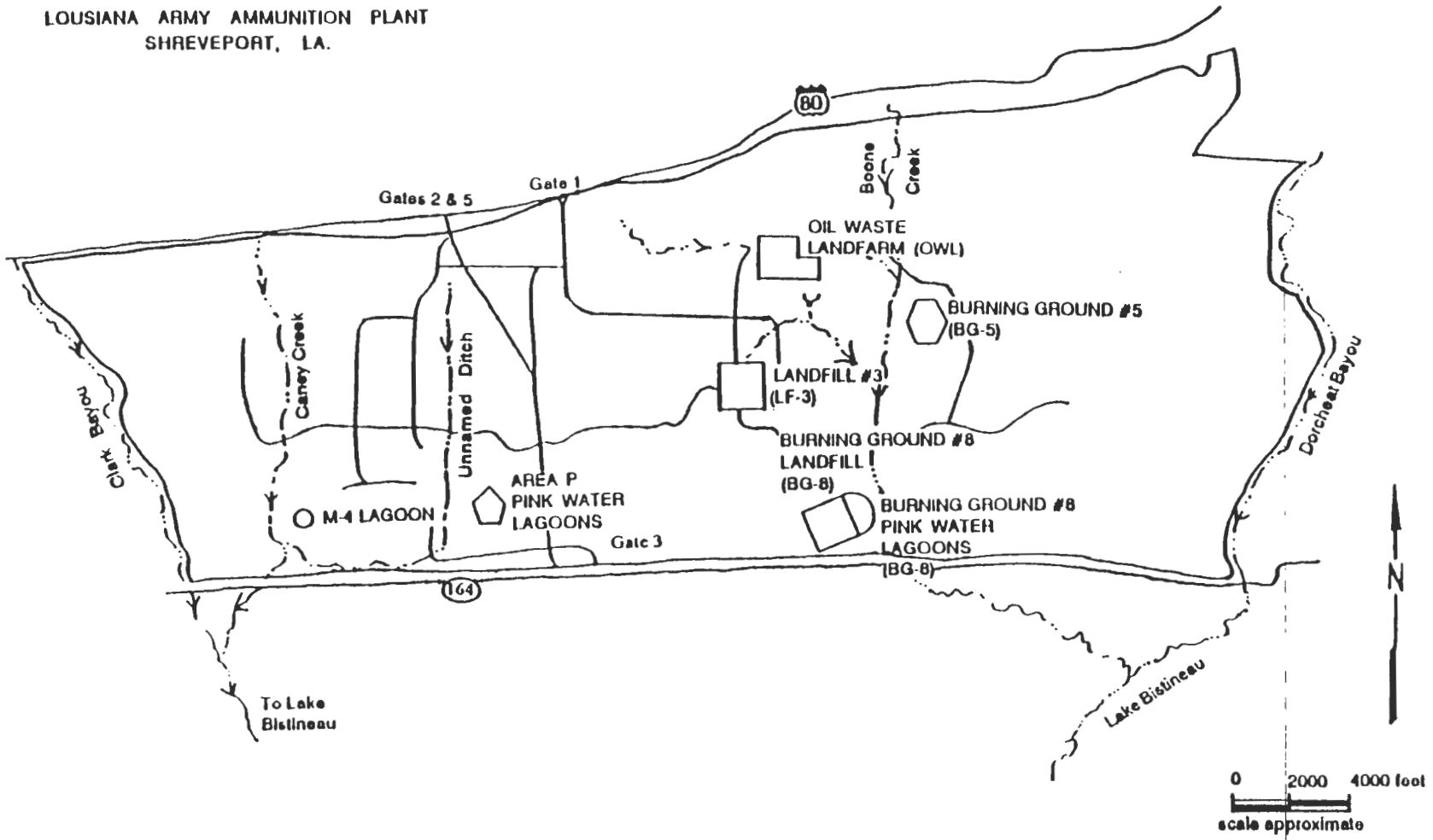


Figure 2.5-1
SITE LOCATIONS,
LOUISIANA ARMY AMMUNITION PLANT
FEASIBILITY STUDY
SOURCE: ESE.

Prepared for:
U.S. Army Toxic and Hazardous Materials Agency

Aberdeen Proving Ground, Maryland

Atch 1

Area P (LAAAP-01):

Area P was used as a burning ground for the disposal of explosives and explosives-contaminated wastes during World War II. Thirteen lagoons were constructed on the burning ground in the early 1940's. Pink water (explosive contaminated wastewater) was generated throughout the facility from various manufacturing lines and hauled via tank trucks to the lagoons. Disposal operations were temporarily transferred to Burning Ground 5 in 1952 enabling the construction of more lagoons at Area P. During the Vietnam conflict, at least two more lagoons were constructed in Area P. A levee was built in 1973 to control stormwater runoff. Disposal of explosives-contaminated wastewater into the lagoons was terminated in March 1981.

Contaminants of concern at Area P include cyclotrimethylene-trinitramine (RDX), cyclotetramethylenetetranitramine (HMX), n-Methyl-n-2,4,6-tetranitroaniline (tetryl), 2,4,6-trinitro-toluene (2,4,6-TNT), 2,6-dinitrotoluene (2,6-DNT), 2,4-dinitro-toluene (2,4-DNT), 1,3,5-trinitrobenzene (1,3,5-TNB), 1,3-dinitrobenzene (1,3-DNB), tetrachloroethylene (TCLEE), and nitrobenzene (NB).

The Remedial Investigation found explosives contamination in the soil and groundwater at Area P. Although contamination was found in the shallow aquifers, no contamination was found in the deepest aquifer, from which drinking water is drawn. Because of increased concern about migration of contamination from the site, an interim removal action began in 1987.

International Technology Corporation (IT Corp.) collected and decontaminated 53,604,490 gallons of pink water and rain water using a treatment system consisting of three carbon adsorption columns, two of which were operable in series at any one time.

Soils from Area P were then excavated and incinerated. 65,791 bank cubic yards of contaminated soil from 16 unlined lagoons and adjacent surface areas was treated. IT Corp. used a Hybrid Thermal Treatment System No. 1 (HTTS-1) transportable incinerator to incinerate 101,929 tons of soil. Operating temperatures of 800 F in the rotary kiln and 1650 F in the secondary combustion chamber allowed destruction of contamination to a level acceptable by environmental regulations. No detectable explosives were present in the soil after it was incinerated. Due to the nonuniform distribution of explosives discovered in Area P, excavating to an average depth of 2.2 feet in the lagoons and one foot everywhere outside the lagoons where explosive concentration exceeded 100ppm, would achieve 99.5% of the cleanup objective. The resultant ash from incineration was deposited into seven former lagoons, compacted to a volume of 57,227 bank cubic yards. Area P was officially closed in August of 1990 with capping of the area completed in October of 1990. A

four foot high barbed wire fence encloses the area and a sign is posted which reads, "Restricted Area. Authorized Access Only." Periodic inspections are performed to insure no erosion, ponding, or unwanted vegetative growth occurs. CERCLA also requires a formal review every five years. This report will analyze the effectiveness of the remedy and, as with all reports generated as part of the IRP, will be submitted to state and federal regulators.

The Risk Assessment was completed based on both a current worker and a future residential risk exposure scenario; however, because the likelihood of a residential scenario is slim, a revised Risk Assessment will be completed and will be based on a future worker, recreational, and ecological risk exposure scenario. These revised risk scenarios will be used in the FS. Preliminary results indicate that none of the areas will show a risk based on the future worker/recreational/ecological scenario. If no risk is found, the seven areas of concern will be recommended for no further action and/or long term monitoring (LTM). Results from the completed Risk Assessment will be included in this report, although the FS and any Remedial Actions will be based on the revised scenarios that are presently uncompleted.

Under a current worker exposure risk scenario, Area P shows no risk; however, under a future residential scenario, the following munitions pose a risk due to their presence in groundwater and surface water: 1,3,5-TNB, 2,4,6-TNT, and 2,4-DNT.

Burning Ground 8 (LAAAP-04,07):

Burning Ground 8 (BG8) consists of a landfill and two lagoons. These two areas of concern are treated as one unit since they make up one distinct hydrogeologic regime that is amenable to a single analysis. The 60-acre landfill was used as a burning ground for explosives-contaminated material from the 1950's-1970's; from 1970-1988, it was used as a landfill for sanitary and industrial wastes, used oils, and wastewater. The two unlined lagoons were used to treat and store pink water and Detrex wastes from the 1960's-1970's. Due to rapid infiltration of liquid wastes, the lagoons were backfilled in 1977. From 1977-1984, the lagoons were used to landfarm sludge from the wastewater treatment plant.

Contaminants of concern at BG8 include RDX, HMX, tetryl, 1,3-DNB, 2,4-DNT, 2,6-DNT, NB, 1,3,5-TNB, 2,4,6-TNT, thallium, sulfate, 1,1-Dichloroethene (1,1-DCE), lead (PB), and arsenic (AS).

Remedial Investigation results show explosives contamination in both the soil and groundwater. Early investigations showed thallium and lead contamination in the shallow aquifers. No contamination was found in the deepest aquifer. Under the current worker scenario, BG8 shows no risk; however, under the future residential scenario, the following contaminants pose a risk due to their presence in groundwater and eventual presence in surface water: thallium, 1,3,5-TNB, 2,4,6-TNT, sulfate, RDX, arsenic, 1,3,5-DNB, and 1,1-DCE. Soil is a risk to children due to exposure to 1,3,5-TNB, and 1,3-DNB.

Burning Ground 5 (LAAAP-02):

Burning Ground 5 (BG5) was used for the open burning of waste explosives and explosive contaminated waste since 1947. In 1955, the area had six burn cages and several burn or detonation areas. In 1966, the burn or detonation area consisted of three raised earthen berms which sloped toward a concrete catchment basin. Precipitation flowed from the burn pads to the shallow dikes between the pads to the concrete catchment basin. The basin was closed in 1983. Since 1986, explosive waste at BG5 has been detonated underground.

Contaminants of concern include RDX, HMX, tetryl, 1,3-DNB, 2,4,6-TNT, 2,4-DNT, 2,6-DNT, and 1,3,5-TNB.

Remedial Investigation results show explosives contamination in both the soil and groundwater. Because BG5 is currently operational, it is likely that a continuing source of soil and groundwater contamination is present. As with other areas on LAAP, no contamination has been found in the drinking water aquifer. Under the current worker scenario, BG5 shows no risk; however, under the future residential scenario, the following munitions pose a risk due to their presence in groundwater and soil: 1,3,5-TNB, RDX, 1,3-DNB, HMX, 2,4,6-TNT, 2,6-DNT, and 2,4-DNT.

Landfill 3 (LAAAP-05):

Landfill 3 (LF3) consists of nine former pink water lagoons used in the 1950s and 1960s. After the 1960s, the lagoons were used as landfills for construction debris, dirt, and inert waste.

Contaminants of concern include RDX, HMX, tetryl, 1,3-DNB, 2,4-DNT, 2,6-DNT, 1,3,5-TNB, and benzene (C_6H_6).

Remedial Investigation results show explosives contamination in groundwater. No contamination has been found in the drinking water aquifer. Under the current worker scenario, LF3 shows no

risk; however, under the future residential scenario, the following munitions pose a risk due to their presence in groundwater and soil: 1,3,5-TNB in soil and 1,3,5-TNB, 1,3-DNB, and RDX in groundwater.

Oily Waste Landfarm (LAAAP-06):

The Oily Waste Landfarm (OWL) consists of three pits used to treat oily wastes and chlorinated solvents from 1960-1975. Forging operations waste consisting of dissolved and suspended solids, caustics, grease and oils, zinc, phosphorus, biological inhibitors, and emulsifiers, were treated with alum and polymers. The clarified water was discharged to Boone Creek and the waste sludge was disced into surrounding soils. The pits were backfilled in 1975 and the area was enlarged to facilitate landfarming of oily wastes.

Contaminants of concern include trichloroethene (TRCLE), TCLEE, C6H6, 1,1-DCE, PB, and AS.

Remedial Investigation results show explosives contamination and lead contamination in groundwater. No contamination has been found in the drinking water aquifer. Under the current worker scenario, OWL shows no risk; however, under the future residential scenario, the following munitions pose a risk due to their presence in groundwater: 1,1-DCE, TCLEE, and benzene.

M-4 Lagoon (LAAAP-03):

The M-4 unlined lagoon was used to retain wastewater from an electroplating operation for machining and metal plating of grenade components from 1962-1964. The volume of wastewater held in the lagoon was approximately 60,000 gallons. The wastewater contained cyanide, cadmium, chromium, and zinc, and was oxidized by adding chlorine prior to delivery to the lagoons.

Contaminants of concern include 1,2-Dichloroethane (1,2-DCLE), PB and AS.

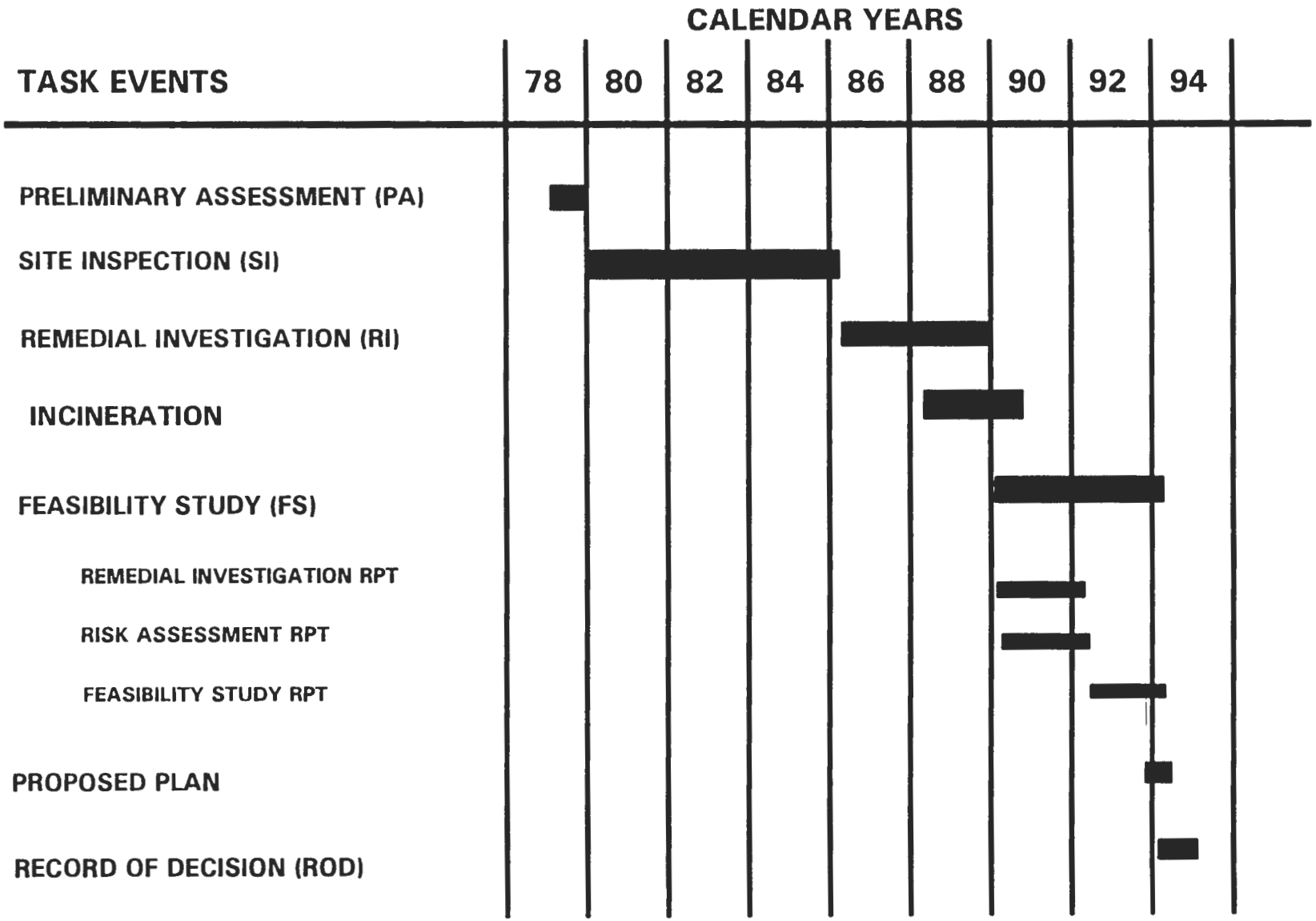
Remedial Investigation results show explosives contamination and lead contamination in groundwater. No contamination has been found in the drinking water aquifer, the Wilcox-Carrizo aquifer. Under the current worker scenario, M4 shows no risk; however, under the future residential scenario, lead in groundwater poses a risk.

LOUISIANA ARMY AMMUNITION PLANT
INSTALLATION RESTORATION PROGRAM
SITE SUMMARY CHART

SITE	CHEMICALS OF CONCERN	CURRENT PHASE OF INVESTIGATION	COMPLETED INTERIM REMOVAL/ REMEDIAL ACTION	RECOMMENDED FUTURE IRP PHASE
AREA P (LAAAP-01) DPM = 23.8 HRS = 30.26	EXPLOSIVES, NITROAROMATICS, VOLATILES	FS	INCINERATION, COMPLETED MAY 90	LTM
BURNING GROUND 5 (LAAAP-02)	EXPLOSIVES, NITROAROMATICS	FS	-	LTM
M-4 LAGOON (LAAAP-03)	HEAVY METALS, VOLATILES	FS	-	NFRAP
BURNING GROUND 8 LANDFILL (LAAAP-04)	EXPLOSIVES, NITROAROMATICS, ANIONS, HEAVY METALS	FS	-	LTM
LANDFILL 3 (LAAAP-05)	EXPLOSIVES, NITROAROMATICS, VOLATILES	FS	-	LTM
OILY WASTE LANDFARM (LAAAP-06)	VOLATILES, HEAVY METALS	FS	-	LTM
BURNING GROUND 8 LAGOON (LAAAP-07)	EXPLOSIVES, NITROAROMATICS, ANIONS, HEAVY METALS	FS	-	LTM

KEY: FS = FEASIBILITY STUDY, RD = REMEDIAL DESIGN, NFRAP = NO FURTHER REMEDIAL ACTION PLANNED, LTM = LONG TERM MONITORING

IRP ACTIVITY AT LAAP



Atch 2

5. SCHEDULE

A Feasibility Study (FS) task for all seven areas was awarded in September 1989. Due to the large number of reports produced in the past, the FS involves producing a Comprehensive Remedial Investigation (RI) as well as a Risk Assessment, a Proposed Plan, and a Record of Decision. Both the Comprehensive RI and the Risk Assessment final report was distributed to EPA Region VI and LDEQ in February 1992. The FS will develop, screen, then provide a detailed analysis of alternatives for remedial action.

For a schedule of IRP work completed to date and planned for the next few years at LAAP, see Attachment 2.

6. COST ESTIMATES

An estimate of past, present, and projected funding for Installation Restoration Program activities has been broken down by fiscal year and is as follows:

PRIOR YEAR FUNDS:

FY78	Records Search	$ 50.0K
FY80	Off-post Sampling and Analysis	3.8K
	LAAP Boundary Well Survey	57.6K
FY81	LAAP Preliminary Contamination Survey	279.3K
FY83	Biannual Groundwater Monitoring	16.9K
FY86	LAAP Remedial Investigation	502.0K
	Site Clearing	1.2K
FY87	LAAP Feasibility Study	752.4K
	Incineration	11,303.1K
FY88	Monitor Well Site Clearing and Installation Site Support	22.4K
	Off-Post Drilling Right of Entry Agreements - Ft. Worth District CE	10.1K
	Technical Escort Unit Support for BG5 Excavation	2.9K
	Off-Post Sampling	.1K
	Off-Post Sampling	1.2K
	Incineration	20,031.2K
FY89	RI/FS	2,371.2K
	Off-Post Monitoring Wells Resampling	0.1K
	Sampling of Doyline Water Supply Wells	0.8K
	Post Wide Resampling Effort	20.2K
	Sampling of Village Water Supply System	1.1K
	Re-analysis of Village Water Supply	3.3K
	Groundwater Modeling Effort	177.3K
	Drinking Water Well Monitoring	18.5K
	Incineration	794.8K

FY90	FS Task Modification	451.8K
	RI/FS Follow-on	6.0K
	Incineration	843.0K
	USTs	359.2K
FY91	Area P Incineration S&A	77.7K
	Follow on RI/FS (7 Areas of Concern)	51.4K
	UXO Clearing of Burning Ground	7.4K
	Total	$38,218.0K

CURRENT YEAR FUNDS (FY92):

FY92	Installation RI/FS & RA	619.0K
	State Reimbursement	50.0K
	Total	$669.0K

FUNDS REQUIRED BY FISCAL YEAR TO COMPLETION: *

FY93	RI/FS and RA and Groundwater Monitoring	5,506.0K
FY94	RI/FS and RD/RA and Monitoring	3,350.0K
FY95	RD/RA and Monitoring	3,050.0K
FY96	RA and Monitoring	5,000.0K
FY97	RA and Monitoring	5,000.0K
FY98	RA and Monitoring	5,000.0K
FY99	RA and Monitoring	5,000.0K
	Total	$31,906.0K

Total Funding from Inception to Completion $70,793 .0K

* Note that out-year funding is based upon the worst case scenario (new sites would be discovered then these sites in addition to the seven original sites would demand remedial action), as opposed to this plan which recommends long-term monitoring for the current seven sites.

Attachment 3 shows a graphical illustration of the above figures.

7. SUMMARY OF REMOVAL ACTION ASSESSMENT EVALUATION

The Comprehensive Remedial Investigation and Risk Assessment have been completed and the Feasibility Study (FS) has begun. Because the FS will be based on a future worker and future recreational risk exposure scenario, a mini Risk Assessment using these scenarios will be included in the FS. The unlikelihood of the future residential scenario will be fully documented in the FS. Preliminary results indicate that none of the areas will show a risk based on the future worker/future recreational scenario. If no risk is found, the seven areas of concern will be recommended for no further action and/or long-term monitoring (LTM). LTM would involve regular sampling of drinking water wells, monitor wells, surface water, and any other area agreed to by all involved parties.

An interim remedial action has been completed for Area P. Interim removal or remedial actions are not recommended since most if not all of these areas will be recommended for no further action and/or long-term monitoring. The revised Risk Assessment and draft FS will be completed by the summer of 1992. If, at that time, an area of concern shows a risk using the future worker or future recreational scenario, a removal or interim remedial action will be assessed. Until that time, it is recommended that no removal action be taken. Attachment 4 is a chart which summarizes the current phase of investigation, any interim removal or remedial action that has occurred, and the recommended future IRP phase at LAAP.

Louisiana Army Ammunition Plant has successfully progressed through many phases of the Installation Restoration Program. The Interim Remedial Action and investigations have resulted in expenditures of approximately $38,218,000 through fiscal year 1991. With no schedule delays, completion of the Feasibility Study, the Proposed Plan, and the Record of Decision should occur in FY93, with possible Remedial Design and Action immediately following.

FUNDING PROFILE FOR LAAP (IN K'S)

TASK EVENTS	FISCAL YEARS									
	78-79	80-81	82-83	84-85	86-87	88-89	90-91	92-93	94-95	96-97
PRELIMINARY ASSESSMENT	50	57.6								
SITE INSPECTION		3.8	279.3							
REMEDIAL INVESTIGATION					1,256	25.3		3406	3000	
INCINERATION					11,303	20,836	920.7			
FEASIBILITY STUDY						2549	516.6	2719	3400	
DRINKING WATER MONITORING						25.1				
REMEDIAL DESIGN										2000
REMEDIAL ACTION										8000
GROUNDWATER MONITORING			16.9			20.3				
PUBLIC/REGULATOR FUNDING								50		

Atch 3

FUNDING PROFILE FOR LAAP (IN K'S)

TASK EVENTS	FISCAL YEARS									
	78-79	80-81	82-83	84-85	86-87	88-89	90-91	92-93	94-95	96-97
PRELIMINARY ASSESSMENT	50	57.6								
SITE INSPECTION		3.8	279.3							
REMEDIAL INVESTIGATION					1,256	25.3		3406	3000	
INCINERATION					11,303	20,836	920.7			
FEASIBILITY STUDY						2549	516.6	2719	3400	
DRINKING WATER MONITORING						25.1				
REMEDIAL DESIGN										2000
REMEDIAL ACTION										8000
GROUNDWATER MONITORING			16.9			20.3				
PUBLIC/REGULATOR FUNDING								50		

Atch 3

FY90	FS Task Modification	451.8K
	RI/FS Follow-on	6.0K
	Incineration	843.0K
	USTs	359.2K
FY91	Area P Incineration S&A	77.7K
	Follow on RI/FS (7 Areas of Concern)	51.4K
	UXO Clearing of Burning Ground	7.4K
	Total	$38,218.0K

CURRENT YEAR FUNDS (FY92):

FY92	Installation RI/FS & RA	619.0K
	State Reimbursement	50.0K
	Total	$669.0K

FUNDS REQUIRED BY FISCAL YEAR TO COMPLETION: *

FY93	RI/FS and RA and Groundwater Monitoring	5,506.0K
FY94	RI/FS and RD/RA and Monitoring	3,350.0K
FY95	RD/RA and Monitoring	3,050.0K
FY96	RA and Monitoring	5,000.0K
FY97	RA and Monitoring	5,000.0K
FY98	RA and Monitoring	5,000.0K
FY99	RA and Monitoring	5,000.0K
	Total	$31,906.0K

Total Funding from Inception to Completion $70,793 .0K

* Note that out-year funding is based upon the worst case scenario (new sites would be discovered then these sites in addition to the seven original sites would demand remedial action), as opposed to this plan which recommends long-term monitoring for the current seven sites.

Attachment 3 shows a graphical illustration of the above figures.

7. SUMMARY OF REMOVAL ACTION ASSESSMENT EVALUATION

The Comprehensive Remedial Investigation and Risk Assessment have been completed and the Feasibility Study (FS) has begun. Because the FS will be based on a future worker and future recreational risk exposure scenario, a mini Risk Assessment using these scenarios will be included in the FS. The unlikelihood of the future residential scenario will be fully documented in the FS. Preliminary results indicate that none of the areas will show a risk based on the future worker/future recreational scenario. If no risk is found, the seven areas of concern will be recommended for no further action and/or long-term monitoring (LTM). LTM would involve regular sampling of drinking water wells, monitor wells, surface water, and any other area agreed to by all involved parties.

An interim remedial action has been completed for Area P. Interim removal or remedial actions are not recommended since most if not all of these areas will be recommended for no further action and/or long-term monitoring. The revised Risk Assessment and draft FS will be completed by the summer of 1992. If, at that time, an area of concern shows a risk using the future worker or future recreational scenario, a removal or interim remedial action will be assessed. Until that time, it is recommended that no removal action be taken. Attachment 4 is a chart which summarizes the current phase of investigation, any interim removal or remedial action that has occurred, and the recommended future IRP phase at LAAP.

Louisiana Army Ammunition Plant has successfully progressed through many phases of the Installation Restoration Program. The Interim Remedial Action and investigations have resulted in expenditures of approximately $38,218,000 through fiscal year 1991. With no schedule delays, completion of the Feasibility Study, the Proposed Plan, and the Record of Decision should occur in FY93, with possible Remedial Design and Action immediately following.

DEPARTMENT OF THE ARMY
HUNTSVILLE DIVISION, CORPS OF ENGINEERS
P.O. BOX 1600
HUNTSVILLE, ALABAMA 35807-4301

REPLY TO
ATTENTION OF

CEHND-PM-EP (415-10g) 10 April 1992

MEMORANDUM FOR Commander, Seneca Army Depot, Attn: SDSSE-HE (Mr. Absolom), Romulus, New York 14541-5001

SUBJECT: Installation Restoration Program (IRP) Action Plan, Seneca Army Depot

1. Reference memorandum, SDSSE-HE, 2 April 1992, subject as above.

2. Huntsville Division has been aware of the potential Defense Environmental Restoration Program (DERP) budget increase for some time now. Our intention has been to be in a position to award as many of Seneca Army Depot (SEAD) projects as possible when, and if, the additional funding becomes available.

3. The following is the most current appraisal of the circumstances surrounding each of the five projects named in the subject memorandum. New concerns have been raised by our review of the FY92 Installation Restoration Program (IRP) Work Plan which was approved on 6 March 1992 and a copy received by this office on 6 April 1992.

a. The Phase II Remedial Investigations at the Ash Landfill and Open Burning (OB) Ground Areas (1383 Nos. SE0091F002 and SE0091F003, respectively) are listed on the approved Work Plan as "Subject To Availability Of Funds" (SAF) projects. This means that we can prepare Statements of Work (SOWs) and negotiate contracts, short of award. This will make it easier for us to actually award these contracts if, and when, funds do become available. However, you should be aware that there are potential difficulties due to circumstances which are out of our control. The Environmental Protection Agency, Region II, has given notice that 60 days will be required to complete their review of the Preliminary Site Characterization Summary Reports for both the Ash Landfill and OB Ground Remedial Investigations (RI). This will push the schedule for award of both Phase II investigations back into the August - September 1992 timeframe. In order to assure award by mid-September 1992, our absolute deadline for receiving EPA input to the Preliminary Site Characterization Summary Reports for incorporation into the Phase II SOWs is 3 July 1992. However, a mid-September award may not be good

encl 1

enough if funds are being disbursed on a "first come" basis. Consequently, it is imperative that SEAD increase pressure on the regulators for the purpose of ensuring that all regulatory reviews are conducted according to the stipulations of the Interagency Agreement (IAG); for example, 30 days.

b. The establishment of a Comprehensive Groundwater Monitoring Program (1383 No. SE-SW-29) is also listed on the approved Installation Restoration Program (IRP) Work Plan as "SAF", so we can pursue this project as discussed under Item a, above. This project is not presently intended for regulatory input; therefore, delays as discussed above are not anticipated. However, we await information detailing the wells to be included in the program and the parameters to be monitored. This information was requested from SEAD and should be provided prior to 1 May 1992 to assure a timely award.

c. The Implementation of Site Investigation (SI) Work Plan for 11 SWMUs (1383 No. SE0090F003), although listed on prior working drafts of the IRP Work Plan (as "RI/FS of Contaminated Sites", see Enclosure 1) has been deleted from the approved Work Plan (see Enclosure 2). Consequently, we are not in a position to prepare a SOW for this project. Seneca Army Depot will need to inquire as to whether it is possible to have this project reinserted. Even with authorization to proceed, some issues remain to be resolved, between SEAD and C.T. Main, concerning placement of wells at the Open Detonation Grounds. The Preliminary-Draft Work Plan for this project has been shelved for some time now awaiting these resolutions. Continued delays will prevent the initiation of regulatory review thereby postponing award of any SOW to late FY 1992. In order to assure award by September 1992, this Division needs to have the technical disagreements resolved and regulatory submission by 5 June 1992 and authorization to proceed (through inclusion on the Work Plan) no later than 3 July 1992.

d. The Development of an SI Work Plan for 15 SWMUs (1383 No. SE0090F003) did not get included in the approved Work Plan. Consequently, we cannot proceed with SOW preparation as

requested. Authorization to proceed (by inclusion in the Work Plan) is required by 3 July 1992 in order to assure award by September 1992.

4. To summarize, Huntsville Division is aware of the current situation and needs of SEAD. The referenced priority projects which are considered "SAF" will be awarded assuming the additional DERP funding will actually become available. The remaining projects will be pursued as vigorously, if they are added to the Work Plan. Seneca Army Depot should be aware that some difficulties are possible if we do not receive cooperation from the regulators and the input required from them.

5. If you have any further questions, please contact Mr. Kevin Healy at 205-955-3281.

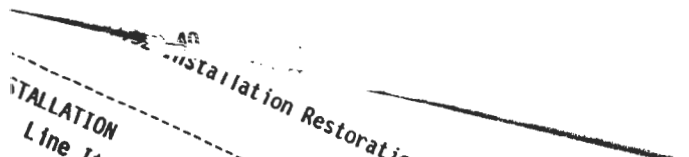
FOR THE COMMANDER:

2 Encls

for LEO H. CARDEN
Chief, Programs & Project
Management Directorate

INSTALLATION Line Item	SITE		PROJECT STATUS	PS	EXEC AGCY	FY92 FUND $(000)	REMARKS	1383 NUMBER	AWARD STATUS	PAR NUMBER
46	-002	INCINERATION ASH LANDFILL	RI/SA	C	CEMP	50		SE-SF-21		2A36790SEA02
47	-MUL	WORKPLAN FOR 11 SWMUs	RI/SA	C	CEMP	50	$$ NO FALL 1383			2A36790SEA3A
48	-001	OB GROUND	RI/SA	C	CEMP	50		SE-SF-7		2A36790SEA01
149	-MUL	TANK REMOVAL	REM	I	CEMP	150		SE0090S001		2A36790SEAMS
		---------- SENECA ARMY DEPOT TOTAL FUNDING:				300	----			
427	-001	OB GROUND S&A	RI/SA	V	CEMP	85		SE0091F003		
428	-001	OB GROUND	RI/FS	V	CEMP	950	FY92 SCOPING	SE-SF-7		
429	-MUL	SWMU CLASSIFICATION REPORT	RI	V	CEMP	950	FY92 SCOPING	SE0090F003		
430	-MUL	OB/OD ESCORTS	PRJSPT	V	INST	100		SE0090S008		
431	-ALL	INSTALL & SAMPLE GROUNDWATER MONITORING SYS	M	V	CEMP	330	FY92 SCOPING	SE-SW-29		
432	-002	INCINERATION ASH LANDFILL S&A	RI/SA	V	CEMP	85		SE0091F002		
433	-002	INCINERATION ASH LANDFILL	RI/FS	V	CEMP	950		SE-SF-21		
434	-TBD	RI/FS STUDY OF CONTAMINATED SITES S&A	RI/SA	V	CEMP	85		SE0091F001		
435	-TBD	RI/FS STUDY OF CONTAMINATED SITES	RI/FS	V	CEMP	1500		SE-SF-17		
		SENECA ARMY DEPOT TOTAL REQUIREMENTS:				5335				
1										
SIERRA ARMY DEPOT										
138	-MUL	PHASE III	RI/FS	I	THAMA	3343				
		---------- SIERRA ARMY DEPOT TOTAL FUNDING:				3343	----			
488	-TBD	SITES 1-6, FOLLOW ON RI/FS PHASE I	RI/FS	b	THAMA	2600		SA-SF-10D		
489	-ALL	EOD SUPPORT	PRJSPT	b	INST	180		SA-SF-10F		
490	-MUL	INSTALLATION RESTORATION RI/FS & RA	RI/FS	b	THAMA	6930	FY92 SCOPING	SA-SF-10		
491	-MUL	SITES 1-6, RD/RA PHASE I	RD/RA	b	CEMP	250		SA-SF-10A		
492	-TBD	RI/FS, PHASE III	RI/FS	b	THAMA	3700		SA-SF-10H		
493	-TBD	ALL MONITORING	M	b	CEMP	200		SA-SF-10G		
494	-TBD	1 TO 12, PHASE II UNITS	IRA	b	CEMP	250	$$ NO FALL 1383			2A06821SADZA
		SIERRA ARMY DEPOT TOTAL REQUIREMENTS:				17453				
ST LOUIS AAP										
529	-TBD	UNDERGROUND STORAGE TANKS	REM	c	CEMP	250	FY92 SCOPING	SLAP919002		
731	-TBD	INSTALLATION ASSESSMENT	RI/FS	f	CEMP	40		SLAP919004		

Enclosure 1



LLATION / Line Item	SITE		PROJECT STATUS	PS	EXEC AGCY	FY92 $(000)	REMARKS	1383 NUMBER	AWARD STATUS	PAR NUMBER
1717	-TBD	IRP GW SAMPLING & ANALYSIS	RI	y	CEMP	500	BRAC 91	SC-SF-12		
1718	-002	IRP BURN PITS	M	y	CEMP	25	BRAC 91	SC-SF-16		
1719	-019	IRP 1960'S DISPOSAL TRENCHES	FS	y	CEMP	100	BRAC 91	SC0089S036		
1720	-018	IRP 1950'S DISPOSAL TRENCHES	FS	y	CEMP	100	BRAC 91	SC0089S035		
1721	-009	IRP BLDG 315 CYANIDE SUMP	FS	y	CEMP	50	BRAC 91	SC0089S037		
1723	-002	IRP BURN PITS	RA/SA	y	CEMP	25	BRAC 91	SC-SF-16		
1724	-002	IRP BURN PITS	RA	y	CEMP	5050	BRAC 91	SC-SF-16		
1725	-ALL	IRP SAAD STATE TECHNICAL ASSIST COST	STREIM	y	INST	120	BRAC 91-DSMOA?	SC0089S050		
		SACRAMENTO ARMY DEPOT TOTAL REQUIREMENTS:				8299				
IA DEPOT ACT										
105	-TBD	PROJECT SUPPORT	PRJSPT	D	INST	25	$$ NO FALL 1383			
329	-MUL	AMMO WASHOUT LAGOON INCINERATION	RA	R	CEMP	3300	FY92 SAF	SV-SF-9		
		SAVANNA DEPOT ACT TOTAL FUNDING:				3325	----			
338	-MUL	RI/FS OF ALL DEPOT SITES AND SWMU'S	RI/FS	R	THAMA	600	FY92 SCOPING	SV0089S005		
		SAVANNA DEPOT ACT TOTAL REQUIREMENTS:				3925				
IELD BARRACKS MIL RES										
222	-TBD	STATE REIMBURSEMENT	STREIM	L	INST	50		NPL-326		
285	-TBD	INSTALLATION SI	SI	R	THAMA	114				
286	-001	NPL SITE CLEANUP (OU 1)	RI/FS	R	THAMA	210		NPL-324		
		SCHOFIELD BARRACKS MIL RES TOTAL FUNDING:				374	----			
359	-001	NPL SITE CLEANUP (OU 1)	RI/FS	R	THAMA	2290	FY92 SCOPING	NPL-324		
360	-TBD	NPL SITE CLEANUP (OU 4)	RI/FS	R	THAMA	1000	FY92 SCOPING	NPL-329		
361	-TBD	NPL SITE CLEANUP (OU 3)	PA/SI	R	THAMA	600	FY92 SCOPING	NPL-328		
362	-TBD	NPL SITE CLEANUP (OU 2)	RI/FS	R	THAMA	500	FY92 SCOPING	NPL-325		
363	-TBD	PROGRAM SUPPORT CE(POD)	PRJSPT	R	CEMP	50	FY92 SCOPING	NPL-327		
		SCHOFIELD BARRACKS MIL RES TOTAL REQUIREMENTS:				4814				
ARMY DEPOT										

FY92 Installation Restoration Division Workplan Approved on 07 MAR 92 All Sites
Exclusive of PS Codes: [t,y,z]

INSTALLATION Line Item	SITE		PROJECT STATUS	PS	EXEC AGCY	FY92 FUND $(000)	REMARKS	1383 NUMBER	AWARD STATUS	PAR NUMBER
129	-004	O&M OF SOUTH POST G/W TREATMENT PLANT	RAOP	F	CESPK	100	BRAC 91	SC0090S061	A	2A06758SAA4E
130	-TBD	IRP OFFPOST IRA	RD/SA	F	CESPK	40	BRAC 91	SC0089S012	A	2A06758SAA4A
131	-ALL	IRP QA SAMPLING & ANALYSIS	RI	F	CESPK	13	BRAC 91	SC0090S060	A	2A06759SAA07
132	-001	IRP OXIDATION LAGOON	RA/SA	F	CESPK	60	BRAC 91*13837	SC0089S013	A	2A06758SAA06
133	-011	IRP TANK #2 PROJECT	M	F	CESPK	100	BRAC 91	SC-SF-17	A	2A06758SAA5A
134	-011	IRP TANK #2 PROJECT	RA/SA	F	CESPK	7	BRAC 91*13837		A	2A06758SAA5A
135	-011	IRP TANK #2 PROJECT	M/SA	F	CESPK	25	BRAC 91	SC-SF-17	A	2A06758SAA04
		SACRAMENTO ARMY DEPOT TOTAL REQUIREMENTS:				504				
SAVANNA DEPOT ACT										
118	-TBD	PROJECT SUPPORT	PRJSPT	D	INST	25	$$ NO FALL 1383			
		SAVANNA DEPOT ACT TOTAL FUNDING:				25	----			
372	-MUL	AMMO WASHOUT LAGOON INCINERATION	RA	R	CEORL	3000	$1000 3Q	SV-SF-9	A	
381	-MUL	RI/FS OF ALL DEPOT SITES AND SWMU'S	RI/FS	R	THAMA	600		SV0089S005	3	
		SAVANNA DEPOT ACT TOTAL REQUIREMENTS:				3625				
SCHOFIELD BARRACKS MIL RES										
253	-TBD	STATE REIMBURSEMENT	STREIM	L	INST	50		NPL-326		
324	-TBD	NPL SITE CLEANUP (OU 1)-INSTALLATION SI	SI	R	THAMA	114	$69 2Q	NPL-324	A	
325	-001	NPL SITE CLEANUP (OU 1)	RI/FS	R	THAMA	210		NPL-324	3	
		SCHOFIELD BARRACKS MIL RES TOTAL FUNDING:				374	----			
402	-001	NPL SITE CLEANUP (OU 1)	RI/FS	R	THAMA	2291		NPL-324	3	
403	-TBD	NPL SITE CLEANUP (OU 4)	RI/FS	R	THAMA	1000		NPL-329	3	
404	-TBD	NPL SITE CLEANUP (OU 3)	PA/SI	R	THAMA	670		NPL-328	2	
405	-TBD	NPL SITE CLEANUP (OU 2)	RI/FS	R	THAMA	500		NPL-325	3	
		SCHOFIELD BARRACKS MIL RES TOTAL REQUIREMENTS:				4835				
SENECA ARMY DEPOT										
47	-002	INCINERATION ASH LANDFILL	RI/SA	C	CEHND	96		SE-SF-21	A	2A36790SEA02
48	-MUL	WORKPLAN FOR 11 SWMUs	RI/SA	C	CEHND	50	$$ NO FALL 1383		A	2A36790SEA3A

Enclosure 2

INSTALLATION / Line Item	SITE		PROJECT STATUS	PS	EXEC AGCY	FY92 FUND $(000)	REMARKS	1383 NUMBER	AWARD STATUS	PAR NUMBER
49	-001	OB GROUND	RI/SA	C	CEHND	113		SE-SF-7	A	2A36790SEA01
163	-MUL	TANK REMOVAL	REM	I	CENAN	187	$119 3Q	SE0090S001	A	2A36790SEAMS
	----------	SENECA ARMY DEPOT TOTAL FUNDING:				446	----			
470	-001	OB GROUND S&A	RI/SA	V	CEHND	85		SE0091F003	3	
471	-001	OB GROUND	RI/FS	V	CEHND	950		SE-SF-7	3	
472	-MUL	SWMU CLASSIFICATION REPORT	RI	V	CEHND	950		SE0090F003	3	
473	-MUL	OB/OD ESCORTS	PRJSPT	V	INST	100		SE0090S008		
474	-ALL	INSTALL & SAMPLE GROUNDWATER MONITORING SYS	M	V	CEHND	330		SE-SW-29	3	
475	-002	INCINERATION ASH LANDFILL S&A	RI/SA	V	CEHND	85		SE0091F002	3	
476	-002	INCINERATION ASH LANDFILL	RI/FS	V	CEHND	950		SE-SF-21	3	
		SENECA ARMY DEPOT TOTAL REQUIREMENTS:				3896				
SIERRA ARMY DEPOT										
152	-MUL	PHASE III	RI/FS	I	THAMA	3343			A	
217	-TBD	PHASE II MOD	RI/FS	J	THAMA	186			A	
	----------	SIERRA ARMY DEPOT TOTAL FUNDING:				3529	----			
552	-TBD	SITES 1-6, FOLLOW ON RI/FS PHASE I	RI/FS	b	THAMA	2600	$2400 REMAINS	SA-SF-10D	3	
553	-ALL	EOD SUPPORT	PRJSPT	b	INST	180		SA-SF-10F		
554	-MUL	SITES 1-6, RD/RA PHASE I	RD/RA	b	CESPK	250		SA-SF-10A	4	
555	-TBD	ALL MONITORING	M	b	CESPK	200	$185 4Q	SA-SF-10G	3	
556	-TBD	1 TO 12, PHASE II UNITS	IRA	b	CESPK	250	$$ NO FALL 1383			2A06821SADZA
		SIERRA ARMY DEPOT TOTAL REQUIREMENTS:				7009				
ST LOUIS AAP										
588	-TBD	UNDERGROUND STORAGE TANKS	REM	c	CEMP	250		SLAP919002		
761	-TBD	INSTALLATION ASSESSMENT	RI/FS	f	CEMRK	40		SLAP919004		
		ST LOUIS AAP TOTAL REQUIREMENTS:				290				
STAN R MICKELSON SAFEGRD CMPLX										
30	-TBD	IRP PROGRAM MANAGEMENT (M&S)	PGMMGT	B	INST	25		91S0011	A	

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: / /
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE-SF-17 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1990
Project Name: RI/FS STUDY OF CONTAMINATED SITES Fiscal Year Completed: 0

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: ESDP Pollution Category: RINV
Program Area: MACOM Priority:
Initiation Reason: Instn Priority: 0 Discontinue Reason:

Plan/Design Scheduled Completion: 10/88 Work/Const Scheduled Completion: / 0
Work/Constr Scheduled Start: / Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 12900

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1990	400	400	0										
788008.11	1992	2000	2000	0										
788008.11	1993	2000	0	0										
788008.11	1994	3000	0	0										
788008.11	1995	1500	0	0										
788008.11	1996	1500	0	0										
788008.11	1997	1500	0	0										
788008.11	1998	1000	0	0										

Narrative:
AN UPDATED SI IS EXPECTED TO IDENTIFY POTENTIAL SITES CONTAMINATED WITH A HAZARDOUS SUBSTANCE (SWMUS-AOC). A REMEDIAL INVESTIGATION WILL BE REQUIRED TO ADDRESS THE SITES CONFIRMED TO HAVE CONTAMINATION PRESENT FROM SI. OUT YEARS ARE F/RD&RA (SEAD006-022,024-04 1-AOCS). Workplan-enter line #413 05Nov91 approved.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 10/15/91
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0091F006 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1993
Project Name: SI'S FOR HIGH PRIORITY AREAS OF CONCERN Fiscal Year Completed:

Project Assessment: H Class: 2 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: ESDF Pollution Category: PASI
Program Area: RMA CONTAMINATION CLEANUP MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 09/93 Work/Const Scheduled Completion: 12/94
Work/Constr Scheduled Start: 05/94 Final Compliance Required: 12/97

Fund Type: DERA - OMA Total Est. Cost: 5000

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1993	2000	2000	0										
788008.11	1994	1500	0	0										
788008.11	1995	1500	0	0										

Narrative:
CERCLA PASI's required at sites/areas of concern (AOC). High priority AOC's have high possibility of soil and groundwater contamination, AOC's include washout plant (SEAD-4), power burning pit (SEAD-24), Burial Pits (SEAD 12, 63), IRFNA pits (SEAD-13), Fire DEMO Pad (SEAD-25), Fire training pit & pad (SEAD-26), BLDG 606 Test Lab (SEAD 43), Fill area Bldg 135 (SEAD-59). RI/FS Determination made end FY.95

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 6078691309
Facility Type: DEPOT
Project Number: SE0092S009 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: PHASE II RI ASH LANDFILL Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: RINV
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 08/91 Work/Const Scheduled Completion: 12/06
Work/Constr Scheduled Start: 10/91 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 1000

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	1000	1000	0										

Narrative:
PHASE II RI REQUIRED FOR CONTINUATION OF RIFS (REF SE-SF-21) AT ASH LANDFILL.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S010 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: PHASE II RI OB GROUND Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: ESDP Pollution Category: RINV
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 09/89 Work/Const Scheduled Completion: 10/87
Work/Constr Scheduled Start: 06/87 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 1000

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	1000	1000	0										

Narrative:
PHASE II RI REQ'D FOR CONTINUATION OF RIFS (REF SE-SF-7) AT OB GROUNDS.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S011 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI WASHOUT PLANT Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR MUNITIONS WASHOUT PLANT LEACH FIELD. RCRA CORRECTIVE ACTION REQUIREMANTS APPLY. (SEAD-8)

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S012 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI OLD CONSTRUCTION DEBRIS LANDFILL Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 01/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR OLD CONSTRUCTION DEBRIS LANDFILL. RCRA CORRECTIVE ACTION REQUIREMENTS ALSO APPLY (SEAD-11).

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S013 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI FOR IRFNA SITE Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR IRFNA DISPOSAL SITE. RCRA CORRECTIVE ACTION REQUIREMENTS ALSO APPLY. (SEAD-13)

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S014 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI FOR ABANDONED DEACT FURNACE Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR ABANDONED DEASTIVATION FURNACE (BLDG S-311). RCRA CORRECTIVE ACTION REQUIREMENTS ALSO APPLY (SEAD-16).

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 04/30/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact:
Support Installation: NONE Zip: 145415001 Telephone:
Facility Type: DEPOT
Project Number: SE0092S015 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 0
Project Name: SI FOR EXISTING DEACTI Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category:
Program Area: MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR EXISTING DEACTIVATION FURNACE (BLDG 367). RCRA CORRECTIVE ACTION APPLIES (SEAD-17). PART B PERMIT IS APPLIED FOR THIS SITE.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S016 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI FOR ABANDONED POWER BURNING PIT Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR ABANDONED POWER BURNING PIT (SEAD-24). RCRA CORRECTIVE ACTION APPLIES.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S017 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI FOR FIRE DEMO PAD Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR FIRE TRAINING AND DEMO PAD (SEAD-25). RCRA CORRECTION ACTION APPLIES.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S018 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI FOR FIRE TRAINING PIT Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR FIRE TRAINING PIT & AREA (SEAD-26). RCRA CORRECTIVE ACTION APPLIES.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S019 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI OD GROUNDS Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR OPEN DETONATION AREA (SEAD 45). RCRA CORRECTIVE ACTION APPLIES. PART B PERMIT APPLICATION SUBMITTED FOR THIS AREA.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S020 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: SI FOR EOD AREA Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
CERCLA SI FOR EOD AREA. RCRA CORRECTIVE ACTION APPLIES.

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S021 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: DISPOSAL OF INVESTIGATION DERIVED WASTES Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 150

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	150	150	0										

Narrative:
INVESTIGATION DERIVED WASTES REQUIRE TESTING AND DISPOSAL IN COMPLIANCE WITH RCRA. (THIS IS AN UNFORSEEN COST FOR SE-SF-21 ASH LANDFILL RIFS AND SE-SF-7 OB GROUNDS RIFS)

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT

MACOM: AMC BSB: Record Status: ACTIVE
SUBCOM: DESCOM ASG: Date Entered: 05/04/92
Date Revised: 05/04/92
Date Discontinued:

Facility: SENECA ARMY DEPOT City: ROMULUS Address: SDSSE-HE
FFID: NY-213820830 Owner Type: GOGO State: NY Country: USA EPA: 02 Contact: GARY KITTELL
Support Installation: NONE Zip: 145415001 Telephone: 607-869-1309
Facility Type: DEPOT
Project Number: SE0092S022 Operable Unit: A Pillar: RST
Local Project Number: Local Project ID Type: Year Funding Required: 1992
Project Name: WORKPLAN FOR 15 AREAS OF CONCERN Fiscal Year Completed:

Project Assessment: H Class: 1 Law/Reg: SFND Project Status: DESIGN PHASE
Compliance Status: CMPA Pollution Category: PASI
Program Area: ACTIVE - INSTALL. RESTORATION MACOM Priority:
Initiation Reason: Instn Priority: Discontinue Reason:

Plan/Design Scheduled Completion: 06/92 Work/Const Scheduled Completion: 12/92
Work/Constr Scheduled Start: 08/92 Final Compliance Required: /

Fund Type: DERA - OMA Total Est. Cost: 200

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated
788008.11	1992	200	200	0										

Narrative:
WORKPLAN FOR CONDUCTING CERCLA SI'S AT 15 ADDITIONAL AREAS OF CONCERN WITH POSSIBLE CONTAMINATION. RCRA CORRECTIVE ACTION APPLIES.

SCOPE & PURPOSE

The following position paper has been prepared by the Engineering and Environmental Management Division of Seneca Army Depot (SEAD) at the recommendation of Mr. John Bernacki, Head Quarters United Stated Depot Systems Command (HQ DESCOM). Mr. Bernacki has requested a brief listing of the adverse effects that will occur if project funding is cut as a result of the Inter Agency Agreement (IAG) for SEAD not being signed. SEAD anticipates that the views presented in this paper will be expressed during the February 20, 1992 MACOM Interchange meeting, to review IR requirements, to be held at USATHAMA.

BACKGROUND

The most recent USACE Installation Restoration Program (IRP) workplan shows Critical IRP projects at SEAD at priority levels that fall below the cut line for funding. These projects include the continuation of Remedial Investigation/Feasibility studies (RI/FS's) at the Ash Landfill and Open Burning Grounds sites. These projects have received the workplan priority code letter "V". The letter "V" is the category of projects characterized by National Priority List (NPL) Sites lacking signed IAG's.

Interagency negotiations between the Army and Regulatory Agencies began in April of 1990. Since this time, the IAG has been revised numerous times. The key players now controlling the fate of the SEAD IAG include the General Law Division of Army Material Command (AMC) and Legal staffs at the Environmental Protection Agency (EPA) and the New York State Department of Environmental Conservation (DEC). Currently, communications between the Army Legal and Regulatory Legal staffs appear to be at a standstill. Prior to the last submittal of a draft IAG to the regulators, AMC's primary concern was that the SEAD IAG deviated from model DOD/EPA guidance language. A revised IAG, which adheres more closely to the model language, was submitted to the Regulatory Legal offices in November of 1991.

In order for SEAD to secure funding for its projects, workplan priority letter's of "R" may be required. A workplan priority letter "R" represent NPL sites with regulator approved schedules for IAG's signed at the DA level. At the project management level (i.e the Army, State, and EPA remedial project management level) the IAG for SEAD remains technically acceptable and is being complied with, as a matter of policy, on a regular basis.

ADVERSE EFFECTS ARE AS FOLLOWS:

- Spread of Contamination

SEAD's Ash Landfill operable unit possesses a high potential for off-post contamination and should, at a minimum, receive an IR workplan priority code of "U". The "U" code is used for projects that can be categorized has having confirmed contamination in close proximity to the installation boundary with a high potential for off-post migration.

In 1989, a CERCLA Site Investigation at the Ash Landfill, involving surface water sampling of privately owned property located downgradiant of the landfill, detected volatile (Trichloroethene,trans-1,2-dichloroethene) and metal (lead, cadmium, chromium) contamination. The highest level of off-post contamination was detected in a sample taken from a drainage ditch approximately 2000 feet upgradiant of the nearest private residence (30.20 ug/L Trichloroethene and 54.60 ug/L Lead).

Quarterly groundwater monitoring results, from on post wells located close to the installations boundary, have shown progressively higher levels of volatile contamination. Monitoring well PT-11, for example, is located within a few yards of the installations boundary. A sample taken from this well in December of 1990 was analyzed and determined to have a concentration of Trichloroethene at 92 ug/L. In September of 1991, samples taken from this well were analyzed and found to have concentration of Trichloroethene at 529 ug/L.

Time is of the essence. Investigations at the landfill have delineated a plume of organic industrial chemicals in aquifers flowing toward the installation boundary and adjacent privately owned residences. Groundwater contamination has not reached key environmental and human targets, to date. However, given the groundwater's current pathway, contamination of downgradient off-post residences seems imminent in the near future. If progress is delayed and residential wells become contaminated, the result will be a costly bottled water program and a greatly complicated remediation agenda.

It is imperative that the Army continue to fund SEAD's FY 92 RI/FS efforts so that progress toward a ROD and Remedial action can continue. Delays now will risk the further downgradient spread of contamination and increase the potential for adverse effects on human an ecological receptors. The Army may not have time to spare, and a window of opportunity for cleanup before problems escalate may be lost if progress is paralyzed due to lack of funding. The possibility for a DOD/Army contamination cleanup success story should not be wasted.

- Loss of Public Trust

SEAD's neighbors have expressed confidence in the installations ability to cleanup the hazardous waste sites which now threaten their community. These sites were created during past decades in which an unenlightened Army improperly disposed of chemical waste. The confidence SEAD's neighbors currently afford the Army should not be taken for granted. This confidence was not given, but rather it was earned through years of up front communications between the concerned public and SEAD's Public Affairs and Environmental Professionals. Although this confidence was not won overnight, it can be easily lost overnight by halting progress toward Remedial Action. If the Army sets idle while contamination migrates into residential wells, public confidence will be betrayed and regaining the public's trust in the future will be impossible.

- Loss of Regulator Trust

If the Headquarters level Army and Regulatory Legal players which currently control the fate of SEAD's IAG remain at odds, and funding for critical IRP projects at SEAD are severed, loss of regulatory trust at the technical project management level will ensue. Technical project management at the Huntsville Division and SEAD currently possess an excellent working relationship with the paralleling project management at the NYSDEC and the EPA. Regulator confidence and trust was not easily achievable, especially in light of the adversarial relationship that the EPA and DOD have often shared in the past due to the gross contamination that has been found to exist at various DOD facilities.

Irrespective of a signed IAG, project management at the EPA and NYSDEC are driven by agendas which require steady progress and timely cleanups. Army technical management as earned the confidence of regulator project management by progressing expeditiously forward and in accordance with the guidance and policies which are endorsed by EPA Region II and NYSDEC technical staffs. Interrupting cleanup progress now will serve to hamper regulatory goals and objectives. Mitigating for the damage that will be created as the result of program stoppage, in terms of damaged Army-Regulator relations at the technical project management level, is difficult to quantify, but the resulting harm is sure to be large and costly.

- Loss of Project Continuity

It is imperative that the same A/E firm performing Phase I Remedial Investigations at the Ash Landfill and Open Burning Grounds sites complete Phase II RI fieldwork and prepare the associated final RI/FS reports. If projects are halted do to lack of funding at this time, field work will be stopped in mid-stream, and the Army will incur the loss of the A/E firm which performed Phase I investigations. This loss will occur as a result of contracting limitations. If the Army delays and a new A/E firm that has no working knowledge of SEAD or the associated EPA Region II and NYSDEC project management staffs is employed, progress toward remediation will inevitable be slowed.

- Loss of Project Continuity (cont'd)

The present Army Corps of Engineers contract with SEAD's current A/E firm, Chase. T. Main (MAIN), expires at the end of FY 92. No additional delivery orders can be awarded to MAIN past this date. Main has been associated with both RI/FS projects at SEAD from their inception, and is intimately familiar with the project management of SEAD, EPA , NYSDEC, and Huntsville Division. If funding is cut for SEAD's projects, the resulting setback to SEAD's IRP program, due to lack of project continuity, will be tremendous.

- Loss of Momentum

Seneca's IRP projects have experienced great success as the result of such factors as: the enlightened and progressive project management of the Huntsville Division; project continuity; a positive working relationship with the State and Federal Regulators; the availability of an A/E firm that commands a detailed working knowledge of SEAD; and an optimistic working relationship between the Army and its neighbors who are affected by the contamination. All of these factors will be adversely effected if the IRP projects at SEAD are halted due to lack of funding. The cumulative detrimental effects of interrupting funding at SEAD will be the defeat of much of the headway which has been gained in recent years.

DEPARTMENT OF THE ARMY

US ARMY TOXIC AND HAZARDOUS MATERIALS AGENCY

ABERDEEN PROVING GROUND, MARYLAND 21010-5401

REPLY TO ATTENTION OF

6 DEC 1989

CETHA-IR-B (50-6c)

MEMORANDUM FOR Commander, Seneca Army Depot (SEAD), ATTN: SDSSE-HE (Mr. Randy Battaglia), Romulus, NY 14541-5001

SUBJECT: SEAD Installation Restoration Program

1. Reference meeting among representatives of EPA Region II, the New York State Department of Environmental Conservation, and the Army, 2 Nov 89, SAB.

2. The meeting minutes prepared by this Agency are enclosed (encl 1). Recommend the enclosed letter (encl 2) defining SEAD's proposals and soliciting comments to the issues discussed at referenced meeting be sent to EPA with a copy to the state.

3. This Agency was requested to clarify the difference between the Administrative Record and the information repository. Both are statutory requirements. The Administrative Record is a compilation of documents that records the Army's decision-making process regarding the selection of a response action to be taken at a site. Its purpose is to serve as the basis of judicial review and to document the Army's consideration of all significant public comments. The information repository is a place where items pertaining to a response action at the site are stored and made available for public inspection and copying. Its purpose is to facilitate public participation in the response action decision process. Also enclosed (encl 3) is guidance describing the contents of the Administrative Record and the information repository.

4. The point of contact for this Agency is Ms. Katherine Gibson at commercial (301) 671-3240/3460.

FOR THE COMMANDER:

Robert J York

3 Encls

ROBERT J. YORK
Chief
Installation Restoration Division

CF (w/encls):
Commander, U.S. Army Materiel Command, ATTN: AMCEN-A (Mr. Bob King), 5001 Eisenhower Avenue, Alexandria, VA 22333-0001
Commander, U.S. Army Depot System Command, ATTN: AMSNS-EN-RD (Mr. Tim Toplisek, Chambersburg, PA 17201-4170
Commander, U.S. Army Engineer Division, Huntsville, ATTN: CEHND-ED-PM (Mr. Bob Nore), P.O. Box 1600, Huntsville, AL 35807-4301

SENECA ARMY DEPOT
11/2/89

NAME	ORGANIZATION	PHONE
Bob Nore	CEHND-ED-PM	(205) 722-1512
Kevin Healy	CEHND-ED-CS (Geotech)	(205) 895-5170
Steven M. Scharf	NYS Dept of Env Conservation	(518) 457-4343
Jeff Healy	Alliance Tech Corp	(617) 275-9000
Kay Stone	EPA	(212) 264-4595
Zaria Jan	EPA - HWMF	(212) 264-8690
Mark R. Paprocki	SEAD	607-869-1450
GARY WALTERS	USATHAMA	(301) 671-3240/3460
Stephen M Absocom	Seneca Army Depot	607-869-1532
Dary Kittell	Seneca Army Depot	607-869-1309
[illegible]	[illegible]	[illegible]-1450
[illegible]	HQDESCOM	717-267-9427
Katherine Gibson	USATHAMA	(301) 671-3460/3240

CETHA-IR-B

22 NOV 1989

MEMORANDUM FOR RECORD

SUBJECT: Meeting minutes for 2 Nov 89 meeting at Seneca Army Depot (SEAD), NY

1. Purpose: The purpose of the meeting was to present the SEAD Installation Restoration Program (IRP) to the New York State Department of Environmental Conservation and the EPA Region II. See the meeting objective and agenda. USATHAMA presented the Army's IRP, and Corps of Engineers Huntsville Division (CEHND) described the status of all SEAD projects and provided schedules for major project deliverables. The meeting concluded with a discussion of statutory requirements for National Priority List (NPL) sites.

2. Personnel Contacted: See attendance list.

3. Each agenda item is discussed below.

a. IRP Overview. USATHAMA explained that the IRP is the DoD equivalent of the national Superfund program and complies with National Contingency Plan (NCP) requirements. USATHAMA is the Army's IRP central program manager and also provides technical support to the installation. The installation, because it is the primary responsible party, is the focal point of communication between the Army and the regulators. The Army is using Corps of Engineers contracting mechanisms to perform field investigations at SEAD.

b. SEAD Installation Restoration Program. CEHND presented status and schedules for the four projects at SEAD: the ash landfill (proposed NPL), the open burning (OB) ground (proposed NPL), the Solid Waste Management Units (SWMU) investigation (RCRA Corrective Action), and the treatability study at the ash landfill. Tasks to perform the RI/FS at the landfill and the treatability study have already been awarded. Draft scopes of work for an RI/FS at the OB ground and an installation RCRA Facility Assessment (RFA) are currently undergoing internal Army review.

(1) The RFA scope is based upon the recommendations of the 1987 AEHA SWMU study that reported 13 out of a total of 43 SWMUs required investigation. The EPA and the state performed a Visual Site Inspection (VSI) and verbally approved the AEHA recommendations. The EPA has not completed evaluation of the VSI report and the AEHA SWMU study so written approval has not been issued. However, EPA questions the rationale for excluding 5 of the sites from the RFA scope and recommends including them if the Army intends to award the RFA before EPA has formally approved the VSI and accepted the AEHA report. EPA will contact SEAD in approximately 3 weeks to specify the sites in question.

(2) The EPA issued comments in late October on the site investigation (SI) at the landfill. EPA pointed out data gaps identified by the SI which should be addressed by the RI. The RI task has already been

awarded, but the Army will attempt to fill the data gaps with the existing scope. However, since the CEHND fixed-price contract does not permit modification, follow-on work may be necessary to satisfy all of the regulators' concerns.

(3) The EPA and the state also commented on the rationale and the design for the treatability study. The treatability study has also been awarded on a fixed-price contract and cannot be modified. It consists of a permeable trench filled with activated carbon installed at the installation boundary designed to intercept the plume and minimize its impact off-post. The trench was originally termed an interim response action (IRA) which prompted intense EPA scrutiny. The Army believes that the need for an IRA has not been established and that this terminology is inappropriate. Many of EPA's concerns over the permeable treatment trench were raised previously by USATHAMA during meetings with SEAD, DESCOM, and AMC. The decision to proceed with the project was based in part on a desire to support the installation and SEAD's claim that the regulators were in agreement with the project as long as it was viewed as a research and development effort. The Army will continue the project as a treatability study with the primary objective to minimize off-post contamination. The trench is not intended to replace long-term remediation of the landfill, nor will it address all migration pathways. The EPA agreed to consider the treatability study a removal action, but objected to the lack of coordination with them on this project.

(4) The EPA disapproves of the Army failing to obtain regulator input to scopes of work in order to expedite contract awards. Failure to obtain regulator concurrence can result in program extension and delays, especially if contracts cannot be modified. The Army agreed to submit all future scopes of work for regulatory comment prior to award.

(5) The Army asked EPA to provide guidance on the disposition of material excavated during the treatability study. What criteria will be used to determine if the excavated material is hazardous? If it is hazardous, can it be returned to the landfill without invoking "land ban" restrictions? Does the 90-day storage limit for hazardous waste begin when the material is excavated or when it is declared hazardous? The EPA will investigate these questions and provide guidance.

(6) EPA and the state requested the results of the off-post quarterly groundwater monitoring which SEAD is conducting. SEAD will provide the results.

(7) USATHAMA proposed that all sites be included in the IAG and regulated as CERCLA sites. Regulating the sites in this way unifies program management and administration for the regulators and the Army by satisfying both RCRA and CERCLA requirements.

(a) The landfill has previously been investigated under CERCLA and is now proposed for the NPL.

(b) The OB ground was previously considered a RCRA corrective action site, but a RCRA clean closure, as requested by the regulators, has an estimated cost of $50M which is unlikely to be funded in the foreseeable future. The OB ground is now proposed for the NPL. A risk-driven CERCLA remediation is affordable and more appropriate because the contamination at the OB ground appears to be immobile.

(c) Approximately 15 SWMUs at SEAD require RCRA corrective action. There is a precedent at other federal facilities to regulate SWMU investigations in the IAG under a CERCLA-driven program. Per internal EPA guidance, RCRA permits may be finalized deferring corrective action requirements to the IAG. This unifies the program for the regulators and the Army by satisfying both RCRA and CERCLA requirements.

(8) USATHAMA recommended a "three operable unit system" to implement the above proposal; operable unit #1 -- ash landfill, operable unit #2 -- OB ground, operable unit #3 -- SWMU investigations. The regulators agreed to consider this recommendation.

c. NPL Required Actions.

(1) Technical Review Committee (TRC). USATHAMA will assist the installation in initiating the TRC by preparing a letter of invitation to all participants. EPA will provide a suggested model charter. USATHAMA also has model charters available. Both EPA and the Army will investigate methods for obtaining a "representative" community member for the TRC.

(2) Inter-agency Agreement (IAG). EPA is currently drafting the IAG and expects it to be ready in December. It will be based on model language negotiated between EPA and DoD and on the Picatinny Arsenal IAG. New York state will participate.

(3) Public Involvement and Response Plan (PIRP). Both the Army and EPA agree that there should be one PIRP for the entire installation. CEHND will develop the PIRP with USATHAMA guidance.

(4) Administrative Record. An administrative record will be maintained at SEAD.

(5) Information Repository. Information repositories will be located where the public has ready access. The PIRP will help to determine these locations.

4. Conclusions and Actions Taken.

a. USATHAMA presented an overview of the IRP.

b. CEHND presented the status and schedules for each of the four projects at SEA

c. The Army will write a letter requesting EPA guidance on the following issues:

(1) list of sites to include in the SWMU investigation,

(2) disposition of material excavated for the treatability study,

(3) model TRC charter.

d. The letter will also reiterate the Army's proposal for a CERCLA-driven program and the three operable unit plan and request formal EPA concurrence with the treatability study objectives.

e. The Army will perform the following actions:

(1) address EPA and state comments on the SI at the landfill and the treatability study by 1 Dec 89,

(2) provide EPA and the state with the results of the quarterly off-post groundwater monitoring,

(3) coordinate all future scopes of work with the regulators prior to award,

(4) initiate a TRC, prepare a PIRP, maintain an administrative record and an information repository .

f. EPA will provide a draft IAG in December 1989.

5. Recommendations. Recommend USATHAMA actively manage the IR Program at SEAD including:

a. coordinating and integrating project schedules into the overall program schedule.

b. budgeting and monitoring expenditure of IRP funds.

c. ensuring standardized IRP procedures are followed.

d. ensuring project coordination with state and EPA regulators.

SENECA ARMY DEPOT

INSTALLATION RESTORATION PROGRAM

NOVEMBER 2, 1989

COORDINATION MEETING AGENDA

Objective: Present the Seneca Army Depot (SEAD) Installation Restoration Program (IRP)

I. IRP Overview

A. DoD Environmental Restoration Program

B. Central Program Manager

C. IRP Process

II. NPL Required Actions

A. Technical Review Committee (TRC)

B. Interagency Agreement (IAG)

C. Public Involvement and Response Plan (PIRP)

D. Administrative Record/Information Repository

III. SEAD Installation Restoration Program

A. Incinerator Ash Landfill RI/FS

B. Treatability Study

C. Burning Ground RI/FS

D. SWMU Investigations

IV. Other Regulatory Issues

Suggested Letter to EPA

Dear Ms. Stone:

The purpose of this letter is to solicit comments to the issues discussed at the November 2, 1989 meeting among representatives from the U.S. Environmental Protection Agency (EPA) Region II, New York State Department of Environmental Conservation, and the U.S. Army at Seneca Army Depot.

The Army proposes to include all sites in an Interagency Agreement (IAG) under a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)-driven program. Regulating the sites in this way unifies program management and administration for the regulators and the Army by satisfying both Resource Conservation and Recovery Act (RCRA) and CERCLA requirements. The Army believes the following points support this proposal:

a. The landfill has previously been investigated under CERCLA and is now proposed for the National Priority List (NPL).

b. The open burning (OB) ground was previously considered for RCRA closure, but is now proposed for the NPL. A RCRA clean closure has an estimated cost of $50M which is unlikely to be funded in the foreseeable future. A risk-driven CERCLA remediation is more readily funded and may be more appropriate at the burning ground where the contaminants appear to have low mobility.

c. Approximately 15 Solid Waste Management Units (SWMUs) at Seneca Army Depot require RCRA corrective action. There is a precedent at other Federal facilities to regulate SWMU investigations in the IAG under a CERCLA-driven program. Per internal EPA guidance, RCRA permits may be finalized deferring corrective action requirements to the IAG.

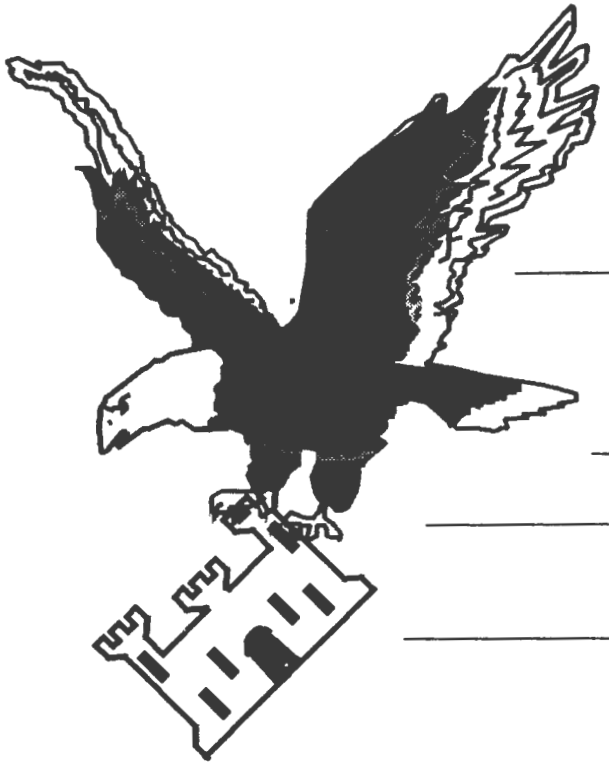
The Army proposes a "three operable unit system" to implement the above proposal; operable unit 1-ash landfill; operable unit 2-OB ground; and operable unit 3-SWMU investigations.

The Army will coordinate all future scopes of work (SOWs) with the EPA. All SOWs are procurement-sensitive. Therefore, the Army requests that EPA perform SOW reviews internally without the use of contractors.

Request the EPA verify the list of SWMU's which the Army plans to investigate based on the 1987 Army SWMU study and the visual site inspection conducted by EPA and the State.

The Army considers the treatability study at the landfill a removal action and not an interim response action. It is an activated carbon trench at the installation boundary designed to prove a treatment technology and, at the same time, reduce off-post migration of a contaminated groundwater plume. It is not intended to replace remediation of the source, nor will it address all migration pathways. Both issues will be considered in the upcoming remedial investigation/feasibility study (RI/FS) at the landfill.

The treatability study trench is a part of the landfill unit. Therefore, material excavated from the trench should not be subject to land disposal restrictions if it is disposed of within the boundaries of the landfill site. Excavation is occurring in undisturbed ground and only native soil and water will be returned to the landfill. Material will not be moved off-site for disposal. Request you respond to this issue as soon as possible to minimize project delays.



INSTALLATION RESTORATION PROGRAM

SENECA ARMY DEPOT

ARMY
INSTALLATION RESTORATION PROGRAM EVOLUTION

1975 - INSTALLATION RESTORATION PROGRAM ESTABLISHED

1976 - RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

1980 - COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA)

1982 - NATIONAL CONTINGENCY PLAN (NCP) - CERCLA REGULATIONS

1984 - HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) CORRECTIVE ACTION (3004 U)

1985 - CERCLA GUIDANCE MANUALS (RI/FS, PHEM)

1986 - SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT

1989 - SUBPART K OF NCP (FEDERAL FACILITIES) - TO BE PUBLISHED

INSTALLATION RESTORATION PROGRAM (IRP)

- DOD Equivalent of National Superfund Program

  Governing Statutes/Regs : CERCLA/SARA
  NCP
  Guidance Documents

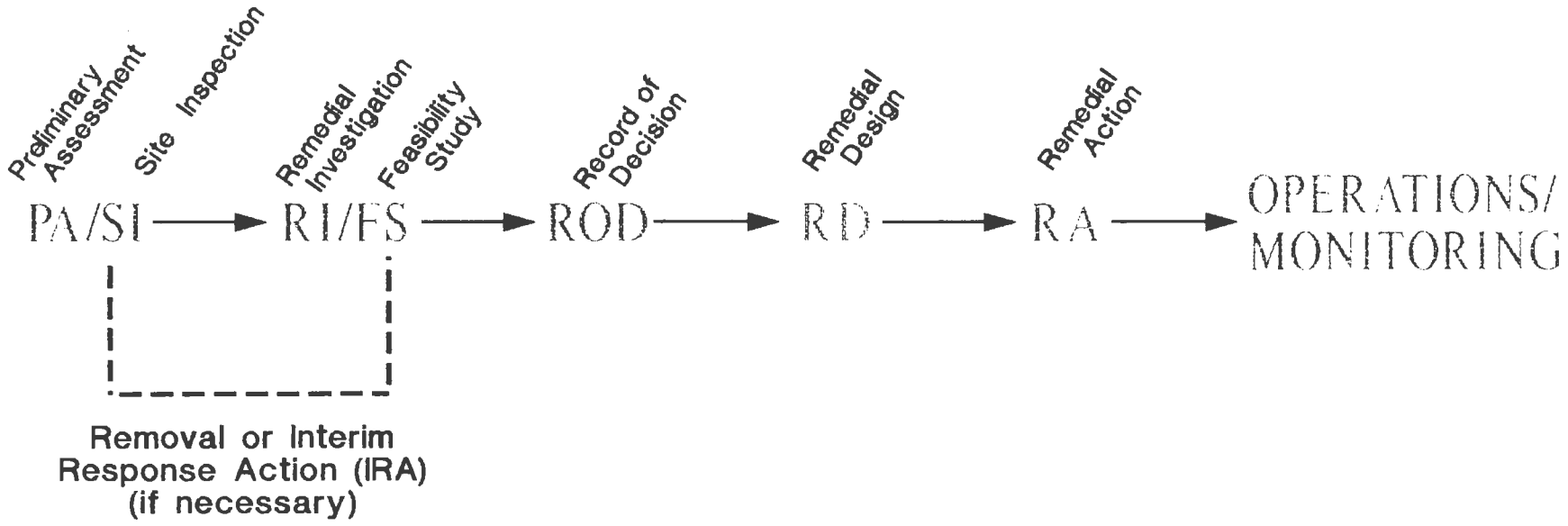
- USATHAMA is Central Program Manager for DA IRP

  Authority of AR 200-1

INSTALLATION RESTORATION DIVISION
KEY PROGRAM RESPONSIBILITIES

- IR PROGRAM MANAGEMENT
  - SUPPORT INSTALLATION COMMANDER IN EXECUTION OF IR EFFORTS
    - SUPPORT ARMY IR PROGRAM THROUGH DEVELOPMENT OF STANDARDIZED PROCEDURES
      - ANNUAL WORK PLAN DEVELOPMENT

IRP PROCESS


Preliminary Assessment
Site Inspection
Remedial Investigation
Feasibility Study
Record of Decision
Remedial Design
Remedial Action
PA/SI
RI/FS
ROD
RD
RA
OPERATIONS/ MONITORING
Removal or Interim Response Action (IRA) (if necessary)

SO WE'RE ON THE NPL

NOW WHAT?

NPL LIST
ACTIONS

DO –

- CONTACT EPA REGION/STATE REGULATORS
- ISOLATE SITES/TAKE REMOVAL MEASURES
- COMMENT ON HRS PACKAGE
- DEVELOP IR PROGRAM PLAN
- DEVELOP PUBLIC INVOLVEMENT AND RESPONSE PLAN
- INITIATE INTERAGENCY AGREEMENT NEGOTIATIONS
- SET UP INFORMATION REPOSITORY
- SET UP ADMINISTRATIVE RECORD
- SET UP TECHNICAL REVIEW COMMITTEE
- GET PEOPLE TRAINING AS HAZARDOUS WASTE WORKERS

TECHNICAL REVIEW COMMITTEE

PURPOSE:
- TO ESTABLISH AN "INFORMATION SHARING" GROUP
- TO FACILITATE COMMUNICATION AND COORDINATION AMONG GROUP MEMBERS

COMPOSITION:
- INSTALLATION
- EPA
- STATE
- LOCAL GOVERNMENT
- PUBLIC

FUNCTION:
- TO OBTAIN COORDINATED DIRECTION TO IRP ACTIONS THROUGH CONSULTATION WITH ALL MEMBERS
- FOR EACH MEMBER TO REVIEW ALL IRP ACTIONS AND PROVIDE PARENT AGENCY VIEWS

INTERAGENCY AGREEMENT/ FEDERAL FACILITY AGREEMENT (IAG/FFA)

Allingham

PURPOSE: ESTABLISHES
- OBJECTIVES
- RESPONSIBILITIES
- PROCEDURAL FRAMEWORK
- SCHEDULES

FOR IMPLEMENTING THE IR PROGRAM

PLAYERS:
- EPA
- STATE
- ARMY

WHEN
- ESTABLISH EARLY IN PROGRAM
- REQUIRED BY SARA PRIOR TO REMEDIAL ACTION

PUBLIC INVOLVEMENT AND RESPONSE PLAN

REQUIREMENT: SARA 1986

OBJECTIVE: INSURE PUBLIC PARTICIPATION IN THE IR PROGRAM

METHODS:

- PUBLIC INTERVIEWS
- PUBLIC MEETINGS
- INFORMATION REPOSITORY FORMATION AND MAINTENANCE
- REVIEW COMMENT PERIODS

HUNTS COR SEAD NO. 2

Interim Final Rpt, Ground-Water Contamination Surv No. 38-26-0868-88, 27-31 Jul 87

TABLE. SOLID WASTE MANAGEMENT UNITS, SENECA ARMY DEPOT, ROMULUS, NEW YORK.

UNIT NUMBER	UNIT NAME
SEAD-1	Bldg 307 - Hazardous Waste Container Storage
SEAD-2	Bldg 301 - PCB Transformer Storage
SEAD-3	Incinerator Cooling Water Pond
SEAD-4	Munitions Washout Facility Leach Field
SEAD-5	Sewage Sludge Waste Pile
SEAD-6	Abandoned Ash Landfill
SEAD-7	Shale Pit
SEAD-8	Noncombustible Fill Area
SEAD-9	Old Scrap Wood Site
SEAD-10	Present Scrap Wood Site
SEAD-11	Old Construction Debris Landfill
SEAD-12	Radioactive Waste Burial Sites (3)
SEAD-13	IRFNA Disposal Site
SEAD-14	Refuse Burning Pits (2)
SEAD-15	Bldg 2207 - Abandoned Solid Waste Incinerator
SEAD-16	Bldg S-311 - Abandoned Deactivation Furnace
SEAD-17	Bldg 367 - Present Deactivation Furnace
SEAD-18	Bldg 709 - Classified Document Incinerator
SEAD-19	Bldg 801 - Classified Document Incinerator
SEAD-20	Sewage Treatment Plant No. 4
SEAD-21	Sewage Treatment Plant No. 715
SEAD-22	Sewage Treatment Plant No. 314
SEAD-23	Demolition Ground
SEAD-24	Abandoned Powder Burning Pit
SEAD-25	Fire Training and Demonstration Pad
SEAD-26	Fire Training Pit
SEAD-27	Bldg 360 - Steam Cleaning Waste Tank
SEAD-28	Bldg 360 - Underground Waste Oil Tanks (2)
SEAD-29	Bldg 732 - Underground Waste Oil Tank
SEAD-30	Bldg 118 - Underground Waste Oil Tank
SEAD-31	Bldg 117 - Underground Waste Oil Tank
SEAD-32	Bldg 718 - Underground Waste Oil Tanks (2)
SEAD-33	Bldg 121 - Underground Waste Oil Tank
SEAD-34	Bldg 319 - Underground Waste Oil Tanks (2)
SEAD-35	Bldg 718 - Waste Oil-Burning Boilers (3)
SEAD-36	Bldg 121 - Waste Oil-Burning Boilers (2)
SEAD-37	Bldg 319 - Waste Oil-Burning Boilers (2)
SEAD-38	Bldg 2079 - Boiler Blowdown Leach Pit
SEAD-39	Bldg 121 - Boiler Blowdown Leach Pit
SEAD-40	Bldg 319 - Boiler Blowdown Leach Pit
SEAD-41	Bldg 718 - Boiler Blowdown Leach Pit

ADDITIONAL SITES RFA/RFI

Interim Final Rpt, Ground-Water Contamination Surv No. 38-26-0868-88, 27-31 Jul 87

TABLE. SOLID WASTE MANAGEMENT UNITS, SENECA ARMY DEPOT, ROMULUS, NEW YORK.

UNIT NUMBER		UNIT NAME
~~SEAD-1~~		~~Bldg 307 - Hazardous Waste Container Storage~~
~~SEAD-2~~		~~Bldg 301 PCB Transformer Storage~~
SEAD-3	RI/FS	Incinerator Cooling Water Pond
SEAD-4	RFA/RFI S,GW	Munitions Washout Facility Leach Field
~~SEAD-5~~		~~Sewage Sludge Waste Pile~~
SEAD-6	RI/FS	Abandoned Ash Landfill
~~SEAD-7~~		~~Shale Pit~~
SEAD-8	RFA/RFI EXISTING WELL SAMPLES	Noncombustible Fill Area
~~SEAD-9~~		~~Old Scrap Wood Site~~
~~SEAD-10~~		~~Present Scrap Wood Site~~
SEAD-11	RFA/RFI GW	Old Construction Debris Landfill
~~SEAD-12~~		~~Radioactive Waste Burial Sites (3)~~
~~SEAD-13~~		~~IRFNA Disposal Site~~ ([illegible])
SEAD-14	RI/FS	Refuse Burning Pits (2)
SEAD-15	RI/FS	Bldg 2207 - Abandoned Solid Waste Incinerator
SEAD-16	RFA/RFI S,SW IN AREA OF FURNACE	Bldg S-311 - Abandoned Deactivation Furnace
SEAD-17	RFA/RFI S	Bldg 367 - Present Deactivation Furnace
SEAD-18	RFA/RFI ASH SAMPLES	Bldg 709 - Classified Document Incinerator
SEAD-19	RFA/RFI ASH SAMPLES	Bldg 801 - Classified Document Incinerator
~~SEAD-20~~		~~Sewage Treatment Plant No. 4~~
~~SEAD-21~~		~~Sewage Treatment Plant No. 715~~
~~SEAD-22~~		~~Sewage Treatment Plant No. 314~~
SEAD-23	RI/FS OB GROUNDS	Demolition Ground
SEAD-24	RFA/RFI S,GW	Abandoned Powder Burning Pit
SEAD-25	RFA/RFI S	Fire Training and Demonstration Pad
SEAD-26	RFA/RFI S	Fire Training Pit
~~SEAD-27~~		~~Bldg 360 Steam Cleaning Waste Tank~~
~~SEAD-28~~		~~Bldg 360 - Underground Waste Oil Tanks (2)~~
~~SEAD-29~~		~~Bldg 732 Underground Waste Oil Tank~~
~~SEAD-30~~		~~Bldg 118 Underground Waste Oil Tank~~
~~SEAD-31~~		~~Bldg 117 Underground Waste Oil Tank~~
SEAD-32	RFA/RFI TIGHTNESS TEST	Bldg 718 - Underground Waste Oil Tanks (2)
SEAD-33	RFA/RFI TIGHTNESS TEST	Bldg 121 - Underground Waste Oil Tank
SEAD-34	RFA/RFI TIGHTNESS TEST	Bldg 319 - Underground Waste Oil Tanks (2)
~~SEAD-35~~		~~Bldg 718 - Waste Oil-Burning Boilers (3)~~
~~SEAD-36~~		~~Bldg 121 - Waste Oil-Burning Boilers (2)~~
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~~SEAD-38~~		~~Bldg 2079 - Boiler Blowdown Leach Pit~~
~~SEAD-39~~		~~Bldg 121 - Boiler Blowdown Leach Pit~~
~~SEAD-40~~		~~Bldg 319 - Boiler Blowdown Leach Pit~~
~~SEAD-41~~		~~Bldg 718 - Boiler Blowdown Leach Pit~~

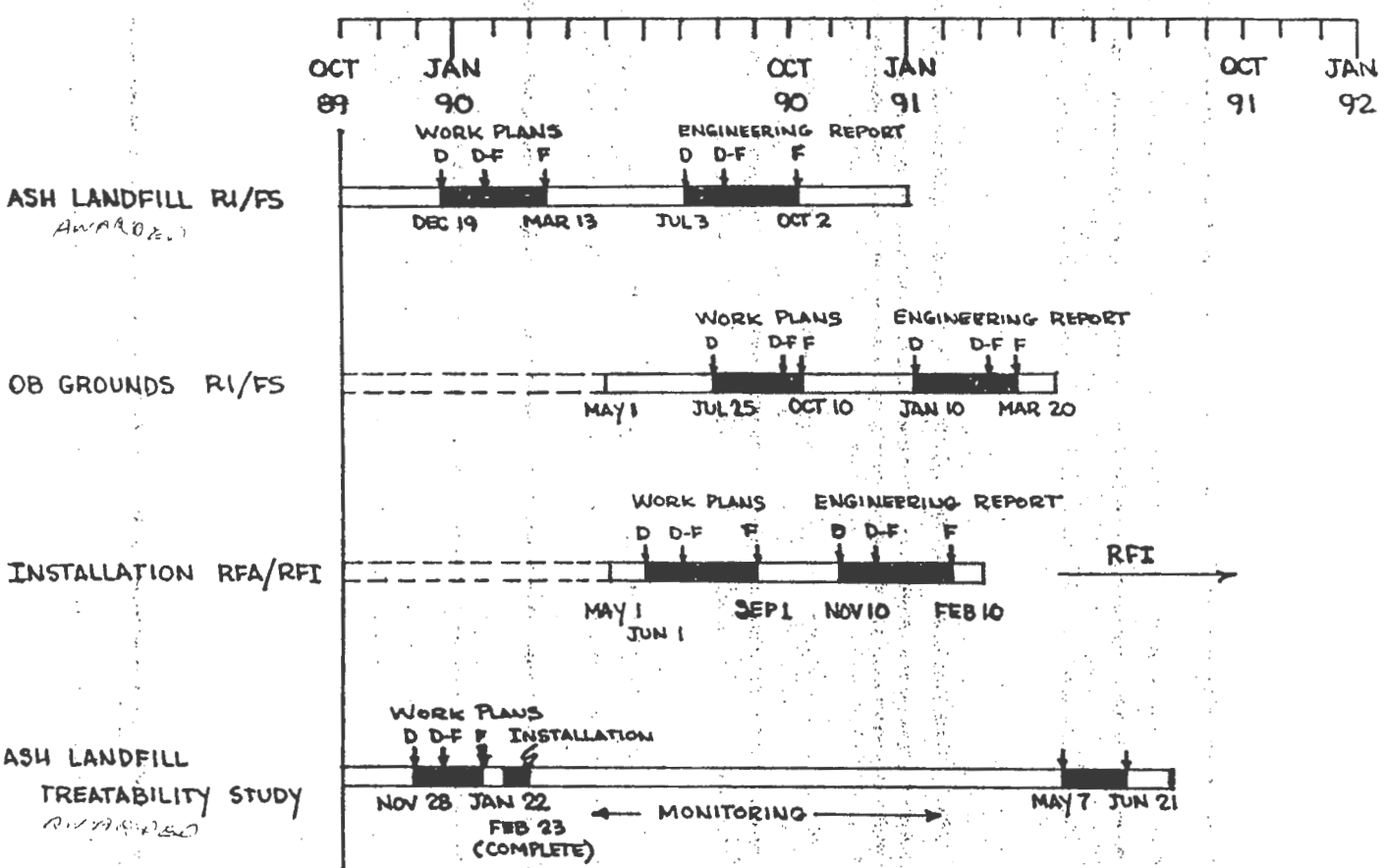
ADDITIONAL SITES RFA/RFI

08100

COMPUTATION SHEET

PROJECT | SUBJECT | PAGE OF | COMPUTED BY | CHECKED BY | DATE | DATE

SENECA ARMY DEPOT
INSTALLATION RESTORATION PROGRAM
SCHEDULE COMPARISON OF ON-GOING WORK



(FOR USE WITH 10 x 10 GRID)

PREVIOUS EDITIONS MAY BE USED

LMV Form 107e
OCT 86

Contents of an Administrative Record

Factual Information

- Sampling Plan
- Sampling Data
- Chain of Custody Forms
- Preliminary Assessment Reports
- Site Evaluation Reports
- Inspection Reports
- Technical Studies
- Factual Information Submitted by Public
- Endangerment Assessment
- Engineering Evaluation/Cost Analysis (EE/CA) Report (Non-Time Critical Removal Action Only)
- QAPP (Remedial Action Process Only)
- Final RI/FS Work Plan (Remedial Action Process Only)
- Amendments to Final RI/FS Work Plan (Remedial Action Process Only)
- Fact Sheets (Remedial Action Process Only)
- Data Summary Sheets (Remedial Action Process Only)
- RI/FS (Remedial Action Process Only)

Policy and Guidance

- Memoranda on Site-Specific Policy Decisions
- Guidance Documents
- Technical Literature (Removal Action Only)

Public Participation

- Submissions Containing Information Considered or Relied on in Selecting Response Action
- Documentation of Meetings
- Public Notices

Public Comments
Responses to Significant Comments
Public Involvement and Response Plan
Transcripts of Public Meeting (Remedial Action Process Only)
Documentation of Other Meetings (Remedial Action Process Only)
Responses to State Comments (Remedial Action Process Only)

Other Party Information

ATSDR Health Assessment
Natural Resources Trustees Findings of Facts
Documentation of State Involvement

Decision Documents

EE/CA Approval Memorandum (Removal Action Only)
Action Memorandum (Removal Action Only)
Proposed Plan (Remedial Action Process Only)
Record of Decision (Remedial Action Process Only)
Decision Document

Enforcement Documents

Administrative Orders
Consent Decree
Affidavits
Notice Letters to PRPs
Responses to Notice Letters Containing Factual Information

INDEX

- o Title,
- o Author,
- o Recipient,
- o Date, and
- o Location.

Periodic updates of the index must be made, either when a new document is added to the record or at consistent and reasonable intervals, e.g., monthly or bimonthly.

An administrative record should not include:

- o Contractor reports prior to Army Quality Assurance;
- o Draft documents not otherwise provided to the public, unless relied on when selecting a response action;
- o Informal notes or comments;
- o Irrelevant information related to other issues, such as liability of PRPs, or documentation of the cost of implementing the selected response, HRS scoring package or contractor work assignments;
- o Documents received after closing the record; or
- o Deliberative documents expressing opinions and recommendations generated before a decision is made, unless relied on when making a response action decision.

In addition, the following privileges and exemptions must be considered before documents are included in the public portions of the record:

- o Matters of national defense or foreign policy,
- o Internal agency rules,
- o Information exempted by other statutes,
- o Trade secrets, commercial or financial information,
- o Privileged inter-agency or intra-agency memoranda,
- o Personal privacy,
- o Investigatory records compiled for law enforcement purposes,
- o Records of financial institutions, and
- o Geological and geophysical information and data concerning wells.

If a document is excluded from the public portion of the record because of a privilege or exemption, but contains factual information considered or relied on to make a decision, that factual information must, if feasible, be extracted and included in the public portion of the record. Any information considered or relied on which is withheld from the public portion of the record must be placed in a confidential portion of the administrative record. In no case can the record omit significant data considered or relied upon to justify the selection of a response action. Legal staff should be involved in the development and compilation of the record in order to ensure its adequacy and completeness for judicial review purposes.

The Army shall maintain an administrative record for each NPL or non-NPL site where a response action may be implemented under the authority of CERCLA. The record must be available for public review and comment by the end of the RI/FS Scoping step when the final RI/FS Work Plan is available.

An administrative record may only physically include the index and any documents unique to the site. To avoid unnecessary duplication, documents that pertain to multiple sites need not be included in each record, but one copy of each of these documents must be made available at the same location as the index.

Other Information

Guidance Documents (should be listed in the index, but can be kept in a compendium available to the public in a central location preferably in the same room as the administrative record)

NPL Rulemaking Docket Information (only if relevant to the selection of a response action)

RCRA Information (only if relevant to the selection of a response action)

Negotiations with PRPs (only if relevant and not confidential)

Contents of an Information Respository to include, but not limited to:

- Public Involvement and Response Plan,
- RI/FS Work Plan,
- Final RI Report,
- Draft Feasibility Study,
- Record of Decision,
- Remedial Design,
- Fact Sheets,
- Guidance Documents,
- CERCLA,
- NCP,
- NPL, and
- Administrative Record.