UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

51-89

file
SEDA 12

AUG 2 3 1998

EXPRESS MAIL

Stephen M. Absolom
BRAC Environmental Coordinator
Directorate of Engineering and Housing
Seneca Army Depot Activity (SEDA)
Romulus, New York 14541-5001

Re: Project Scoping Plan for Performing a CERCLA Remedial Investigation / Feasibility Study (RI/FS) at SEAD 12 and SEAD 63 (Scoping Plan)
SEAD 12 Sampling Schedule
Federal Facility Agreement

Dear Mr. Absolom:

EPA received the proposed sampling schedule for SEAD 12 on August 6, 1998, which was prepared by Parsons Engineering Science, Inc. (Parsons ES) for SEDA through the U.S. Army Corps of Engineers New York District and Huntsville Division. Attached please find a table summarizing the test pit, soil boring and groundwater samples EPA would like to split. As we discussed today, the August 6 submittal did not include dates for surface soil sampling. Please provide us with that schedule as soon as possible.

Please be reminded that concerns in EPA's July 21, 1998 letter have not been addressed, and therefore, the Scoping Plan is not considered to be final.

On August 14, 1998, we received Ecological Risk Assessment inserts for the Scoping Plan. Contrary to what is stipulated by Article 17.7 (f) Review and Comment on Draft Documents of our Federal Facility Agreement, no response to written comments was included with the inserts. EPA has provided Ecological Risk Assessment comments in several letters to SEDA regarding both the SEAD 12 and 63 Scoping Plan and the Generic Installation RI/FS Workplan for SEDA. EPA will not review the inserts, until the Army provides a summary of the EPA comments followed by the Army responses that the August 14, 1998 submittal addresses.

A facsimile of this letter will be sent to you today. If you have any questions, please call me at (212) 637-4322.

Sincerely yours,

Carla M. Struble, P.E.
Federal Facilities Section

Attachment

cc: J. Quinn, NYSDEC
D. Geraghty, NYSDOH
R. Scott, NYSDEC-Avon
T. Enroth, USACE-NY
K. Healy, USACE-HD
M. Duchesneau, Parsons ES

ATTACHMENT

Task	Location	Number of Samples	Analyses (a)
Test Pits	TP12-5	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	TP12-24	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	TP12-11	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
Soil Borings	SB12-2	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	SB12-5	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	MW12-14	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	MW12-36	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
Groundwater Sampling	MW12-10	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
	MW12-15	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
	MW12-41	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
	MW12B-1	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

File

CF -
M. Duchesneau
K. Healy
T. Enroth
M. Farnsworth

SEP - 5 1998

EXPRESS MAIL

Stephen M. Absolom
BRAC Environmental Coordinator
Directorate of Engineering and Housing
Seneca Army Depot Activity (SEDA)
Romulus, New York 14541-5001

Re: Project Scoping Plan for Performing a CERCLA Remedial Investigation / Feasibility Study (RI/FS) at SEAD 12 and SEAD 63 (Scoping Plan)
SEAD 12 Sampling Schedule
Federal Facility Agreement

Dear Mr. Absolom:

EPA received the updated sampling schedule for SEAD 12 on September 22, 1998 which now includes dates for surface soil sampling. This was prepared by Parsons Engineering Science, Inc. (Parsons ES) for SEDA through the U.S. Army Corps of Engineers New York District and Huntsville Division. Attached please find a table summarizing the test pit, soil boring groundwater and surface soil samples EPA would like to split.

Contrary to what is stipulated by Article 17.7 (f) Review and Comment on Draft Documents of our Federal Facility Agreement, SEDA still has not provided response to comments, which should have been included with the August 14, 1998 submittal of Ecological Risk Assessment inserts for the Scoping Plan. EPA has provided Ecological Risk Assessment comments in several letters to SEDA regarding both the SEAD 12 and 63 Scoping Plan and the Generic Installation RI/FS Workplan for SEDA. EPA will not review the inserts, until the Army provides a summary of the EPA comments followed by the Army responses that the August 14, 1998 submittal addresses. The Army should propose a deadline for completion and submittal of the required response to comments.

A facsimile of this letter will be sent to you today. If you have any questions, please call me at (212) 637-4322.

Sincerely yours,

Carla M. Struble, P.E.
Federal Facilities Section

Attachment

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D. Geraghty, NYSDOH
R. Scott, NYSDEC-Avon
T. Enroth, USACE-NY
K. Healy, USACE-HD
M. Duchesneau, Parsons ES

ATTACHMENT

		Samples	
Test Pits	TP12-5	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
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	TP12-11	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
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	SB12-5	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	MW12-14	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
	MW12-36	3	TCL/TAL, Radiochemicals, nitrate-nitrogen
Groundwater Sampling	MW12-10	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
	MW12-15	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
	MW12-41	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
	MW12B-1	1	TCL/TAL, Radiochemicals, nitrate-nitrogen, additional parameters
Surface Soil Sampling	SS12-16	1	TCL/TAL, Radiochemicals
	SS12-18	1	TCL/TAL, Radiochemicals
	SS12-19	1	TCL/TAL, Radiochemicals
	SS12-43	1	TCL/TAL, Radiochemicals
	SS12-55	1	TCL/TAL, Radiochemicals
	SS12-65	1	TCL/TAL, Radiochemicals
	SS12-67	1	TCL/TAL, Radiochemicals

File

SEAD12

PARSONS ENGINEERING SCIENCE, INC.

30 Dan Road • Canton, Massachusetts 02021-2809 • (781) 401-3200 • Fax: (781) 401-2575

September 22, 1998

Ms. Carla Struble
USEPA Region II
Emergency & Remedial Response Division
290 Broadway, 18th Floor, E-3
New York, NY 10007-1866

Mr. James Quinn
New York State Department of Environmental Conservation
Bureau of Eastern Remedial Action
Division of Hazardous Waste Remediation
50 Wolf Road
Albany, NY 12233-7010

SUBJECT: Sampling Schedule for SEAD-12 RI/FS, Seneca Army Depot Activity

Dear Ms. Struble/Mr. Quinn:

On August 6, 1998, we sent you a letter notifying you of our proposed schedule for collection of RI/FS samples at SEAD-12. In this letter, we inadvertently omitted the surface soil sampling schedule. Attached is a revised schedule for the SEAD-12 RI/FS sampling. We have sent this schedule to Mr. Bruce Nelson of Malcolm Pirnie and discussed the schedule with him by phone on September 21, 1998.

If you have any questions or concerns, please do not hesitate to call me at (781) 401-2492.

Sincerely,

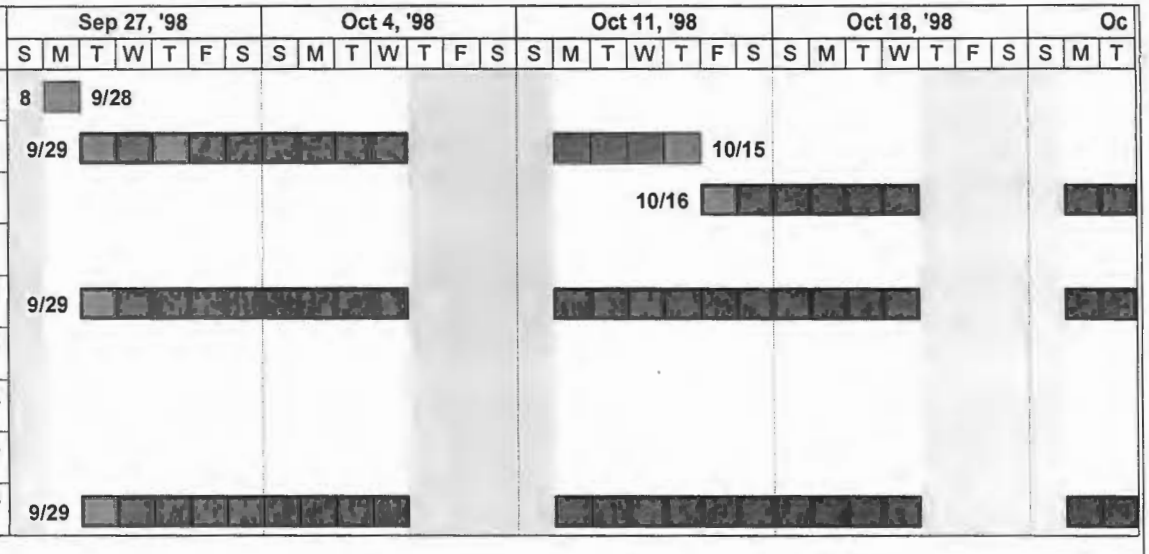
PARSONS ENGINEERING SCIENCE, INC.

Michael Duchesneau, P.E.
Project Manager

h:\eng\seneca\epacvrlt.doc

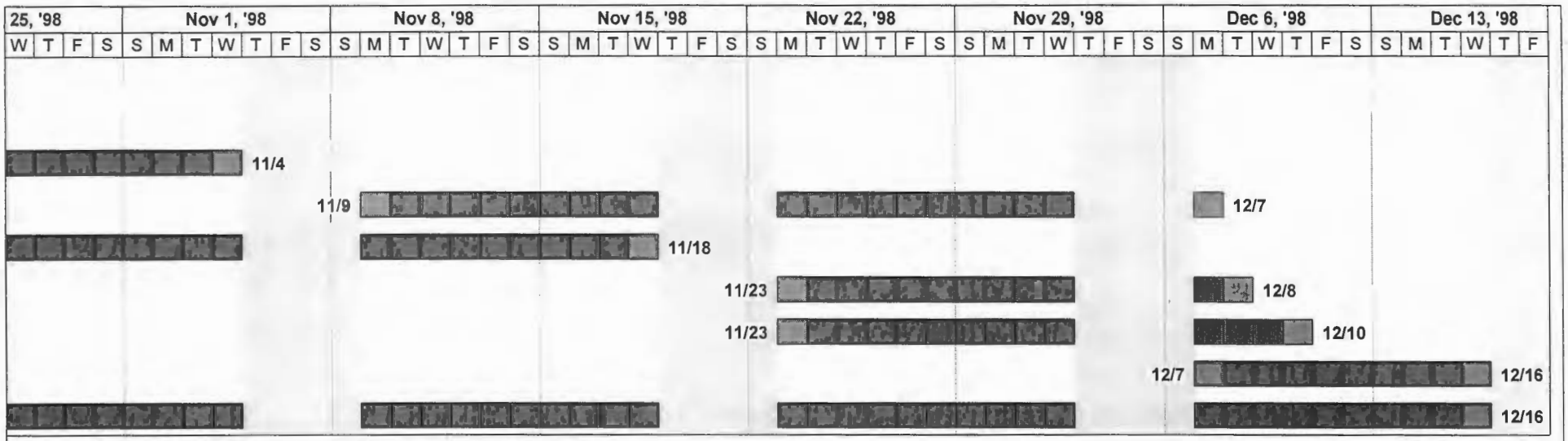
PARSONS

ID	Task Name	personnel
1	mob in/kickoff/initial decon	ALL
2	Test Pits	KKS, HP, Person1
16	Rad Scanning	KKS, HP, Person1
33	Surface Soil Sampling	KKS, HP, Person1
55	Soil Borings / Monitoring Wells	ITR, Person 2
95	Slug Testing	KKS
108	Well Development	ITR
123	Groundwater Sampling	DRG,KKS
134	Sample Management	MCB



Project:
Date: 9/11/98

Task
Progress
Milestone
Summary
Rolled Up Task
Rolled Up Milestone
Rolled Up Progress



Project:
Date: 9/11/98

Task
Progress
Milestone
Summary
Rolled Up Task
Rolled Up Milestone
Rolled Up Progress

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Fax to
M. Duchesneau
K. Healy
T. Enroth
CF Mary F

AUG 25 1998
EXPRESS MAIL

Stephen M. Absolom
BRAC Environmental Coordinator
Directorate of Engineering and Housing
Seneca Army Depot Activity (SEDA)
Romulus, New York 14541-5001

Re: Project Scoping Plan for Performing a CERCLA Remedial Investigation / Feasibility Study (RI/FS) at SEAD 12 and SEAD 63 (Scoping Plan),
SEAD 12 Sampling Schedule
Federal Facility Agreement

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MODE = MEMORY TRANSMISSION START=AUG-25 15:30 END=AUG-25 15:51

FILE NO.= 142

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002	OK	<06>	ES MIKE D	003/003		
003	INC	<07>	COE HEALY	000/003		

-SENECA ENG/ENV -

********** - ***** - 16078691362- **********

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Fax to
M. Duchesneau
K. Healy
T. Enroth
CF Mary F

AUG 2 5 1998
EXPRESS MAIL

Stephen M. Absolom
BRAC Environmental Coordinator
Directorate of Engineering and Housing
Seneca Army Depot Activity (SEDA)
Romulus, New York 14541-5001

Re: Project Scoping Plan for Performing a CERCLA Remedial Investigation / Feasibility Study (RI/FS) at SEAD 12 and SEAD 63 (Scoping Plan),
SEAD 12 Sampling Schedule
Federal Facility Agreement

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MODE = MEMORY TRANSMISSION START=AUG-26 07:22 END=AUG-26 07:24

FILE NO. = 146

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
001	OK	<07>	COE HEALY	003/003		

-SENECA ENG/ENV -

********** - - ***** - 16078691362- **********

File

Done Fax to
M. Duchesneau
K. Healy
T. Enroth
Done CF Mary F

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 25 1998
EXPRESS MAIL

Stephen M. Absolom
BRAC Environmental Coordinator
Directorate of Engineering and Housing
Seneca Army Depot Activity (SEDA)
Romulus, New York 14541-5001

Re: Project Scoping Plan for Performing a CERCLA Remedial Investigation / Feasibility Study (RI/FS) at SEAD 12 and SEAD 63 (Scoping Plan).
SEAD 12 Sampling Schedule
Federal Facility Agreement

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File

SEAD 63

Decision Document
Non-Time Critical Removal Action
At Solid Waste Management Unit (SWMU) SEAD-63
Miscellaneous Components Burial Site
Seneca Army Depot Activity (SEDA)

1 Purpose:

a. This Decision Document describes the selected non-time-critical remedial action for the Miscellaneous Components Burial Site at the Seneca Army Depot Activity (SEDA) chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), the National Contingency Plan (NCP), the Resource Conservation and Recovery Act (RCRA), and Army Regulation (AR) 200-1, as applicable.

b. The purpose of the identified remedial action is to remove military unique items buried at the site and to mitigate the potential source of heavy metal, and radionuclide contamination through the removal of debris and soils. This will reduce the chance of further degradation of soils and groundwater at the Miscellaneous Component Burial Site (SEAD-63). Although site conditions do not currently indicate that a human health risk exists at the site, based on the results of a mini-risk assessment that has been completed, the presence of buried objects, such as drums, is of concern since the nature of the drum contents are unknown. Furthermore, some buried components deposited at SEAD-63 may still be classified or sensitive and would need to be examined by appropriate military personnel for evaluation. The uncertainty of the nature of the buried components and the sensitivity of the materials that may remain in the disposal area is considered justification for performing a removal action at this site. While removal and control of the military items buried at the site is the primary focus of the planned removal action, removal of contaminated soil that surrounds the items will also be addressed during the proposed removal action.

c. SEAD-63 is located in the west-central portion of the former Special Weapons Storage Area (i.e., WSA, also known as the "Q") at the SEDA. SEAD-63 measures approximately 480 feet long by 300 feet wide (i.e., approximately 3.3 acres) and is bounded by paved roads on the north, south, and west, and by open grassland to the east. The site is mostly undeveloped.

d. The site was used during the 1950s and 1960s as a disposal area for classified

military parts. Multiple disposal pits were excavated along a north-south line measuring approximately 200 feet long. The individual pits were between 10 and 30 feet long and were likely to have been excavated down to the surface of the weathered shale. SEDA personnel have identified the types of materials disposed at this site as metal parts. The SWMU Classification Report states that "inert materials" were buried within the disposal pits.

e. Contaminants of primary concern at SEAD-63 include cadmium and mercury in soil. Average site-wide concentrations measured for these two metals exceed comparable levels in the SEDA-specific background data set by more than a factor of two. Additionally, results of the groundwater sampling indicate that groundwater may have been impacted by gross alpha, gross beta, iron and manganese. Finally, shallow soils underlying the man-made drainage ditches contain elevated levels of several polynuclear aromatic hydrocarbon compounds, which exceed state criteria levels by a factor of two to three.

f. This Decision Document concentrates on the performance of a non-time-critical removal action to removed Military unique hardware, buried drums, and associated soil that may be contaminated with chemicals or radionuclides that are associated with the buried Military hardware and drums. Groundwater issues and remedial actions for the closure of the disposal sites will be covered in a separate Decision Documents after completion of the additional groundwater monitoring. The proposed removal action is "not" intended to be the final action for SEAD-63, but an interim solution that will minimize, and possibly eliminate, future releases of chemical and radiological contaminants to the soil, groundwater, surface water and drainage ditch soil.

g. This non-time-critical removal action is being selected by the Army, with support from the US Environmental Protection Agency, Region II (US EPA), the New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH).

2. Site Risk

This Decision Document concentrates on the performance of a non-time-critical removal action to remove military unique hardware, buried drums, and associated soil that may be contaminated with chemicals or radionuclides that are associated with the buried military hardware and drums. Groundwater issues and remedial actions for the closure of the disposal sites will be covered in a separate Decision Documents after completion of the additional groundwater monitoring. The proposed removal action is "not" intended to be the final action for SEAD-63, but an interim

solution that will minimize, and possibly eliminate, future releases of chemical and radiological contaminants to the soil, groundwater, surface water and drainage ditch soil.

3. Remedial Alternatives

a. The primary objective of this non-time-critical removal action is to remove debris and surrounding soils that may have been impacted by releases from the buried debris. A secondary objective is to remove contaminated sediments (i.e., drainage ditch soils) that have been impacted by SVOCs and which may pose a potential risk to resident ecological populations.

b. Excavation, off-site disposal of debris and on-site backfilling of soils involves the excavation of approximately 4,500 cubic yards of soil and debris and approximately 40 cubic yards of sediment (i.e., shallow soil from drainage ditches), sorting of the excavated materials, off-site disposal of sorted materials, and backfilling of soils. Soil and debris will be stockpiled in a bermed staging area. If necessary, debris will be segregated from the soils through use of a vibratory screen. It is estimated that there are approximately 1,000 cubic yards of debris present within the disposal pits. All debris will be screened by Army personnel to determine if any parts or components are classified. Classified parts will be disposed at Army designated locations. In addition, debris will be scanned for the presence of radioisotopes. Any debris found to be radioactive during scanning or known to be a source of radioactivity would be sent to a facility authorized to accept such materials. Any debris free of radioactivity will be recycled or disposed in an industrial landfill.

c. Groundwater collected from dewatering activities during excavation will be stored in frac tanks on-site and analyzed for metals and radionuclides to determine if the groundwater requires treatment prior to discharge. If the discharge criteria are not met, treatment appropriate for metals or radionuclides of concern will be implemented prior to discharge of the water.

d. Upon completion of the removal action, confirmatory soil samples will be collected to confirm that all residual soil satisfied final status survey requirements as outlined in MARSSIM (NUREG-1575, EPA 402-R-97-016, December 1997). The minimum number of data points has been determined to be 34, or 17 from each survey unit and the reference area. Following NUREG and MARSSIM guidance, this number was increased by approximately 20 percent to 20 for each data set, to allow for broken samples and bad, missing, or rejected data. Reference area samples have already been collected for the site.

e. Four new groundwater wells will be installed and the new wells, plus the three existing

wells will be sampled using low-flow purge and pump techniques to reduce the levels of turbidity that are associated with the recovered samples. These samples will be analyzed for metals and radiological constituents and the resulting data will hopefully demonstrate that the groundwater contamination noted during the earlier sampling event results from elevated levels of solids in the samples analyzed. Four additional annual rounds of low-flow purge and pump sampling, and metal and radiological constituent analyses will be performed during the high water season to provide additional data to indicate that the local groundwater is not being impacted by releases from the former military component burial site.

f. The selected alternative provides an immediate reduction in exposure to potential contaminants that may be associated with discarded military components that are present in burial pits at SEAD-63. As some of the buried objects may still be classified, excavation will provide appropriate military personnel the opportunity to inspect recovered components immediately upon uncovering, thus allowing for classified objects to be disposed of at Army designated locations.

4. Public/Community Involvement: The SEDA has a Community Relations Plan (CRP). The NYSDEC, USEPA, and the Restoration Advisory Board (RAB), and Base Closure Team (BCT) have all been advised of the proposed action. In accordance with the CRP, a public notice will be placed in the local newspaper announcing the Army's intent to conduct interim remedial actions in SEAD-63 at least thirty days prior to the initiation of the proposed actions. In the future, a public availability session will be conducted upon completion of final remedies to present findings and status of the remedy to the overall closure to this SWMU.

5. Declaration: The selected interim remedy is protective of human health and the environment, attains Federal and state requirements that are applicable or relevant and appropriate to this interim remedial action, and is cost effective. As previously stated, this interim remedial action is not being proposed as the final remedy for this SWMU. In the future, the selected final remedy will satisfy applicable or relevant and appropriate regulatory requirements for this SWMU to ensure that the remedy provides adequate protection of human health and the environment.

6. Approval and Signature: The selected alternative is for the excavation, examination and disposal of miscellaneous military components, and surrounding soil that may have been contaminated with radiological or chemical constituents that are associated with the military hardware. Additionally, hot spot excavation of surface soil contained in man-made drainage ditches that surround the former military component burial site will be performed to remove soil that contains semivolatile organic compounds at concentrations that represent a potential risk to the resident ecological community. Finally, five years of annual groundwater sampling and analyses will be completed for seven wells to ensure that contaminants associated with the military component burial site are not migrating from the site via groundwater. The estimated cost of the proposed action is not expected to exceed $ 1,090,000. The appropriate approval authority for this action is the _____.

Approved _____ Larry Gutlege

Disapproved _____

********** -COMM.JOURNAL- ********** DATE APR-11-2002 ***** TIME 15:24 *** P.01

MODE = MEMORY TRANSMISSION START=APR-11 15:18 END=APR-11 15:23

FILE NO.= 109

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
001	OK	<06>	PARSONS TODD	016/016		

-SENECA ENG/ENV -

- ***** - 16078691362- **********

****

FAX HEADER

SENECA ARMY DEPOT ACTIVITY
CARETAKER FORCE
PO BOX 9
ROMULUS, NY 14541

TO: Jackie TRAVERS
TODD.
phone: _____
fax: _____

From: Stephen M. Absolom
Commander's Representative
phone: (607) 869-1309
fax: (607) 869-1362
email: absoloms@seneca-hp.army.mil

Regarding: Jackie: the DD for 63 need to be in a summary Format as attached. The words are in the action Memo but as a PDF file I can write it.

CAN you Tweak to this format ?

I also Enclosed GUIDANCE the command is using

S M Absolom

16 pages including header

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CARETAKER FORCE
PO BOX 9
ROMULUS, NY 14541

TO: Jackie TRAVERS
TODD.
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Headquarters, U.S. Army Operations Support Command

Environmental Team

NAME	OFFICE SYMBOL	TELEPHONE NUMBER	
From: WRIGHT	AMSOS-~~MALE~~ -ISR	DSN 793- 1197	Date:
To: SM ABSOLOM			Number of Pages: H+ 6

REMARKS:

STEVE - HERE'S A DD WE JUST GOT SIGNED.

YOU'LL NEED GULLEDGE LEVEL APPROVAL INSTEAD.

NEED TO SPELL OUT ACRONYMS THE 1ST TIME ALSO.

Brad

DECISION DOCUMENT
INTERIM REMEDIAL ACTION (IRA)
AT SOLID WASTE MANAGEMENT UNITS (SWMU) 18/19
OLD/NEW SANITARY LANDFILL & ASH LANDFILL
SUNFLOWER ARMY AMMUNITION PLANT (SFAAP)

1. PURPOSE:

a. This decision document describes the selected IRA to perform temporary erosion repairs of the SWMU 18 and SWMU 19 landfill covers located at SFAAP in DeSoto, Kansas. The SWMU 18 and 19 are identified as the old/new sanitary landfill and the ash landfill, respectively. This IRA was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA), the National Contingency Plan (NCP), Resource Conservation and Recovery Act (RCRA) and AR 200-1, as applicable.

b. The SFAAP was in operation between 1943 and 1992. The SWMU 18/19 encompass approximately 42 acres. The SWMU 18 covers approximately 17 acres with the old landfill lying just south of the new landfill. The ash landfill covers approximately 10 acres. The landfills have been in operation since 1943, with the new landfill beginning operation in 1967. There are also two asbestos landfills located within the boundaries of SWMU 18, which are approximately 1.1 acres in size; however, the asbestos landfills are not considered a part of SWMU 18/19 and are currently operated under a separate Kansas Department of Health and Environment (KDHE) permit. There is no information available on the types of waste buried in the old landfill; however, it does not appear that the landfill was used to dispose of hazardous waste (LAW, 1997). There are no known hazardous waste or hazardous waste constituents present in the new sanitary landfill (LAW, 1997). The quantity of asbestos located in the asbestos landfills is also unknown.

c. The RCRA Facility Investigation (RFI) Addendum for SWMU 18/19 (LAW, 1997) shows seep areas which need to be covered with soil, regraded into native contours, and revegetated. The total surface area of the landfill covers at SWMU 18/19 that will be repaired is approximately 35,000 square feet or 0.8 acres. There are nine separate areas within the landfill perimeter that require repair to the vegetative cover. It has been estimated that this effort will require approximately 4,100 tons of soil to be excavated from an on-site borrow source and transported for placement and compression on impacted (seep) areas.

d. According to the Final RCRA RFI Addendum for SWMU 18/19 (LAW, 1997), of primary concern at the SWMUs are dioxins/furans in the surface soil. Also of primary concern in the groundwater are manganese, cis-1,3-dichloropropene, and ammonia nitrogen. Sulfide was also detected above background in groundwater downgradient of the SWMUs. Sodium has also been identified in soils and groundwater above background, indicating limited leaching from the soils to the groundwater may be occurring.

e. This decision document will concentrate on the IRA for repair of the landfill cover. Groundwater issues and remedial actions for closure of the landfills will be covered in separate decision documents after completion of additional investigations/studies. The action is "not" intended to be a final action for SWMUs 18/19, but an interim solution to prevent further erosion of the landfill cover.

f. This IRA is being selected by the Army with support from the US Environmental Protection Agency (USEPA), Region VII, and the KDHE.

2. SITE RISK:

a. Investigations of SWMU 18/19 began in 1978. At that time, surface water was sampled from two seeps and from a former sediment retention pond located in the southwest corner of the new sanitary landfill. Analyses of these surface water samples indicated elevated specific conductance, total dissolved solids, chlorides and nitrates (US Army Environmental Hygiene Agency (USAEHA), 1980).

b. In 1980, surface water samples were collected from a seep area and the retention pond. These samples were subjected to extraction procedure (EP) metals and selected pesticides. The results were below reporting limits (DM, 1989). The sediment pond was resampled again in 1980 during an USAEHA study for EP metals. Results were below the reporting limits.

c. In 1998 sediments were collected from the same locations as the surface water samples described above. These samples were analyzed for EP metals, priority pollutants, cyanide and Total Petroleum Hydrocarbons (TPHs). No instances of exceeding the EP toxicity criteria were reported. One Volatile Organic Compound (VOC) and TPHs were detected (DM, 1989, PRC, 1990).

d. In 1976, four monitoring wells (MW) were installed to monitor groundwater in the vicinity of the ash landfill and one additional MW was installed in this area in 1978. In 1978, five MWs were installed around the sanitary landfill area. One of these MWs was an upgradient well. Results of the analyses of groundwater samples showed an increase in specific conductance, chlorides, chemical oxygen demand, and total organic carbon. In 1980, analytical results of groundwater samples for EP metals and selected metals were below reporting limits.

e. In 1981, the US Army Corps of Engineers (ACE) installed 11 MWs around the landfill area. Groundwater from these wells was monitored for several parameters, including water quality indicators, selected metals, and phenol. In the fall of 1986, groundwater samples from these wells were also analyzed for VOCs, semi-volatile organic compounds (SVOCs), pesticides/ poly-chlorinated biphenyls (PCBs), cyanide, and other selected metals. No groundwater contaminants of significance were detected, and monitoring of these wells was discontinued in 1986 (DM, 1989).

f. During the 1988 Remedial Investigation (RI) effort, five groundwater samples were collected from MWs installed by the ACE in 1981. Groundwater was analyzed for priority pollutants, TPH, cyanide and sulfate. Several organic compounds were detected below applicable groundwater criteria. The TPHs were detected at a concentration of 2670 ug/l and lead was detected at 0.09 mg/l. Sulfate and sodium exceeded criteria in selected wells.

g. In 1994, a field investigation was conducted at SWMU 18/19 and included the collection and analysis of samples from the following: Captain Creek surface water and sediment, soil gas sampling, monitoring well installation, groundwater, and shallow soil (LAW, 1997).

h. As reported in the Final RFI Addendum for SWMU 18/19 (LAW, 1997), of primary concern at the SWMUs are dioxins/furans in the surface soil. Also of primary concern in the groundwater are manganese, cis-1,3-dichloropropene and ammonia nitrogen. Sulfide was also detected above background in groundwater downgradient of the SWMU. Sodium has also been identified in soils and groundwater above background, indicating limited leaching from the soils to the groundwater may be occurring.

i. Health risks from contaminants of potential concern (COPC) may be from their potential to cause cancer or because of their toxicity. The COPCs are below the levels of concern if

the cumulative hazard index is less than 1 and the cumulative cancer risk is less than 1 x 10^{-6}.

j. For carcinogenic effects, using the target cancer risk range of 1E-06 and 1E-05, preliminary action levels were calculated for exposure to dioxins/furans in surface soils assuming commercial/industrial and construction worker exposure scenarios. Based on a comparison between the preliminary action levels to the exposure point concentrations, 2,3,7,8 - Tetrachlorodibenzodioxin (TCDD) in surface soil exceeded the preliminary action levels for the 1E-06 and 1E-5 target risk level for SWMU 18/19.

k. Potential risks were also calculated for exposure to groundwater for: maintenance/utility workers (dermal contact); construction workers (dermal contact); and off-site residents (ingestion, dermal contact, and inhalation of VOCs). The hazard index (HI) for the off-site residential child was 2, which exceeds the USEPA's target HI of 1. The primary contributors to the noncarcinogenic risk to the residential child are manganese and cis-1,3-dichloropropene via ingestion.

l. Potential risks were calculated for COPCs for surface water, sediments, and passive soil gas and were determined to be below the levels of concern for the cumulative hazard indexes and the cumulative cancer risks.

m. The Final RFI Addendum for SWMUs 18/19 (LAW, 1997) has identified the need for additional investigation and sampling of surface soils and other media for dioxins/furans and the potential need to expand the groundwater monitoring network and perform additional groundwater and surface water sampling.

n. This IRA for the SWMU 18/19 landfills is to cover exposed seep and eroded areas and correct site drainage to prevent future erosion of cover materials. The basis of this IRA stems from the need to protect the integrity of the existing landfill cover and to prevent possible offsite migration of contaminants that may be present in the existing landfills. Repairing the integrity of the landfill cover will prevent surface water runoff from contacting the contents of the landfill and will be transported to adjacent drainage ditches and nearby waterways.

o. Future investigations and remedial actions will be addressed in a forthcoming decision document.

3. REMEDIAL ALTERNATIVES: Due to the immediate need to implement the IRA for repair of the landfill cover, full development of remedial alternatives is not possible at this time. As previously discussed, erosion damage of the landfill cover has exposed the landfill contents, making them susceptible to surface water runoff leading to potential off-site migration of contaminants. Additional investigations, sampling, and engineering are required to fully develop the remedial alternatives leading to the closure of the SWMU 18/19 landfills. Based on this, two remedial alternatives will be discussed: the no action alternative and the temporary repairs to the landfill cover.

a. ALTERNATIVE 1: NO ACTION ALTERNATIVE: In Alternative 1, no actions would be implemented to prevent human exposure to contaminants. This alternative relies on natural physical, chemical, and biological processes to reduce contaminant concentrations over an extended period of time. This alternative provides no immediate reduction in exposure to potential contaminants in soil or debris on the landfills and does not eliminate or reduce exposure pathways due to migration of contaminants from soils to surface water and groundwater, or potential off-site migration of contaminants. Long-term monitoring of soils and groundwater would be required.

b. ALTERNATIVE 2: TEMPORARY REPAIRS TO THE LANDFILL COVERS: Alternative 2 involves the repair of the landfill covers to restore them to a condition similar to the original landfill covers, consisting of a minimum of 18-inches of low permeable soil and approximately 6-inches of topsoil necessary for establishment of a vegetative cover. This alternative will require the implementation of the following activities to complete the landfill cover repairs: identify a suitable borrow source for subsoil and topsoil; excavate, transport and stockpile borrow material at the site; collect and analyze soil samples for dioxins/furans to determine appropriate worker personal protective equipment; backfill, grade and compact soil in seep areas; direct surface water runoff from repaired areas; and topsoil and revegetate disturbed areas. Since this is an interim remedial action, no special permits or plans from the state or USEPA are required. Due to small area of disturbance, a National Pollution Discharge Elimination System (NPDES) permit is not anticipated. This alternative provides an immediate reduction in exposure to potential contaminants in soil and debris on the landfills and reduces exposure pathways due to migration of contaminants from soils to surface water and groundwater. A final remedy for closure of the landfills is required and will be

proposed upon completion of additional investigations and studies.

c. **SELECTED REMEDIAL ALTERNATIVE:** The alternative selected is Alternative 2 - Temporary Repairs to the landfill covers. An existing fence around the SWMU 18/19 landfills will control access to the landfill areas during and after the temporary repairs.

4. **PUBLIC/COMMUNITY INVOLVEMENT:** The SFAAP has a Community Relations Plan. Since this is a temporary interim remedial action, a public notice will not be issued. The KDHE, USEPA, Installation Action Plan (IAP), and Restoration Advisory Board (RAB) have all been advised of the proposed action. In accordance with the Community Relations Plan, a public notice will be placed in the local newspaper announcing the Army's intent to conduct remedial activities at SWMUs 18/19 after completion of the additional investigations and studies. In the future, a public availability session will be conducted upon completion of final remedies to present findings and status of the remedy to the overall closure of these SWMU.

5. **DECLARATION:** The selected remedy is protective of human health and the environment, attains Federal and state requirements that are applicable or relevant and appropriate to this IRA, and is cost effective. As previously stated, this IRA is a temporary repair and is not being proposed as the final remedy for these SWMU. In the future, the selected final remedy will satisfy applicable or relevant and appropriate regulatory requirements for these SWMU to ensure that the remedy provides adequate protection of human health and the environment.

6. **APPROVAL AND SIGNATURE:** The selected alternative is for temporary repair of the SWMU 18/19 Landfill Covers. The estimated cost is not expected to exceed $194,600 for this IRA. The appropriate approval authority for this action is the installation commander.

APPROVED ✓ 01 APR 2002 C. R. HOBBY
Colonel, GS
DISAPPROVED _____ Chief of Staff

STAFFING MATRIX FOR DECISION DOCUMENTS (ROD/DD)

Decision Document:

Organization	Staff Activity	POC Name	Office Symbol	Phone Number	Fax Number
Executing Agent (when installation not executing agent)	Environment				
	Legal				
	Public Affairs				
	CHPPM				
	USAEC				
Installation	Environment				
	Legal				
*When installaiton is executing agent	Public Affairs				
	CHPPM*				
	USAEC*				
SUB-MACOM (If Applicable)	Environment				
	Legal				
	Public Affairs				
	Medical Auth				
SUB-MACOM (when neccessary; $2M)	Environment				
	Legal				
	Public Affairs				
	Medical Auth				
HQDA (when necessary; $6M)	ODEP		DAIM-ED-R	703-697-2828	703-697-0338
	TJAG		DAJA-EL	703-696-1230	703-696-2940
	Army Public Affairs		SAPA-PI	703-697-7591	703-697-7380
	Army Surgeon General		DASG-HS-PM	703-681-3130	703-681-3163

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL
# of pages ▶ 9
To S. ABSOLOM
From
Dept./Agency
Phone #
Fax #
Fax #
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

DEPARTMENT OF THE ARMY
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON DC 20310-0600

DAIM-ED-R (200-1c) 15 NOV 1995

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Revised Interim Policy for Staffing and Approving Decision Documents (DDs)

1. References:

   a. Memorandum, DAIM-ED-R, 28 NOV 94, Subject: Interim Policy for Staffing Decision Documents (DDS)
   b. Paragraph 9-7.f.(3), AR 200-1, Environmental Protection and Enhancement, 23 Apr 90.
   c. Memorandum, SFIM-AEC-IRP, 8 Feb 95, Subject: Revised Installation Restoration Program (IRP) Management Plan.

1. Purpose: The purpose of this memorandum is to provide revised interim policy (enclosed) for the staffing and approval of DDs required or Resource Conservation and Recovery Act (RCRA)

2. Purpose: The purpose of this memorandum is to provide revised interim policy (enclosed) for the staffing and approval of DDs required or Resource Conservation and Recovery Act (RCRA) corrective actions or installation restoration under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) . This memorandum supersedes ref. 1.a., which modified the policy contained in ref. 1.b. It also supersedes the language on pages 22-24 of ref. 1.c. regarding signature authority and approval thresholds, as well as attachment G of that ref. This revised policy still requires DDs for all removal actions, interim remedial actions and remedial actions. National Priorities List (NPL) sites require a formal Record of Decision (ROD) to document cleanup decisions.

3. Policy: Effective immediately, approval thresholds for all DDs, including NPL RODs, are as described in the enclosure. Signature authority for NPL RODs may not be delegated below a general officer or Senior Executive Service official. The only exception is that an installation commander, regardless of grade/rank, may sign NPL RODs selecting the no action alternative.

4. The objective of delegating approval to MACOMs and installations is to speed the process and hasten cleanup. Installation and MACOM commanders must limit future Army liability for restoration activities, while prudently protecting resources. Questions concerning this policy should be addressed to Mr. Michael Vogt, Comm (703) 697-2828 or DSN 227-2828.

FOR THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT:

/signed/
Encl FRANK R. FINCH, P.E.
Colonel, GS

Director, Environmental Programs

DISTRIBUTION:

U.S. FORCES COMMAND, ATTN: AFPI-EN, FT MCPHERSON, GA 30330-6000

U.S. ARMY TRAINING AND DOCTRINE COMMAND, ATTN: ATBO, FT MONROE, VA 23651-5000

U.S. ARMY MATERIAL COMMAND, ATTN: AMCEN, 5001 EISENHOWER AVE., ALEXANDRIA, VA 22333

U.S. ARMY PACIFIC COMMAND, ATTN: APEN; FT SHAFTER, HI 96858-5100

U.S. ARMY CORPS OF ENGINEERS, ATTN: CEMP-R, 20 MASSACHUSETTS

AVE, N.W., WASHINGTON, D.C. 20314

U.S. ARMY INTELLIGENCE AND SECURITY COMMAND, ATTN: IALOG-I, FORT BELVOIR, VA 22060-5370

U.S. ARMY STRATEGIC AND DEFENSE COMMAND, ATTN: CSSD-EN, P.O. BOX 1500, HUNTSVILLE, AL 35807-3801

U.S. ARMY MILITARY DISTRICT OF WASHINGTON, ATTN: ANEN, BLDG.42, FORT MCNAIR, ARLINGTON, VA 20319-5050

U.S. ARMY MILITARY TRAFFIC MANAGEMENT COMMAND, ATTN: MTLO, 5611 COLUMBIA PIKE, FALLS CHURCH, VA 22041-5050

U.S. ARMY MEDICAL COMMAND, ATTN: MCFA, 2050 WORTH ROAD, FORT SAM HOUSTON, TX 78234-6000

U.S. ARMY RESERVE COMMAND, ATTN: AFRC-EN, 3800 NORTH CAMP CREEK PARKWAY, SW., ATLANTA, GA 30331-5099

U.S. ARMY ENVIRONMENTAL CENTER, ATTN: SFIM-AEC-CO, ABERDEEN PROVING GROUND, MD 21010-5401

U.S. ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE, ATTN: MCHB-ME, ABERDEEN PROVING GROUND, MD 21010-5422

CHIEF, NATIONAL GUARD BUREAU: NGB-ARE, ARLINGTON HALL STATION, 111 S. GEORGE MASON DRIVE, ARLINGTON, VA 22303-1454

NORTHERN REGIONAL ENVIRONMENTAL OFFICE, U.S. ARMY ENVIRONMENTAL CENTER, ATTN: SFIM-AEC-NR, BLDG E-4460, ABERDEEN PROVING GROUND, MD, 21010-5401

SOUTHERN REGIONAL ENVIRONMENTAL OFFICE, U.S. ARMY ENVIRONMENTAL CENTER, ATTN: SFIM-AEC-SR, 77 FORSYTHE STREET, SW, STATION E. 362, ATLANTA, GA 30335-6801

CENTRAL REGIONAL ENVIRONMENTAL OFFICE, U.S. ARMY ENVIRONMENTAL CENTER, ATTN: SFIM-AEC-CR, 601 E. 12TH STREET, 647 FEDERAL BUILDING, KANSAS CITY, MO 64106-2896

SUPERINTENDENT, U.S. MILITARY ACADEMY, WEST POINT, ATTN: MAEN, WEST POINT, NY 10996

CF:
DASA (ESOH)
DASG-HS-PM
SAPA-PI
DAJA-EL

Enclosure 1 follows:

REVISED INTERIM POLICY FOR STAFFING AND APPROVING DECISION DOCUMENTS (DDs) (INCLUDING NATIONAL PRIORITIES LIST (NPL) RECORDS OF DECISION (RODs)

1. References:

   a. Memorandum, DAIM-ED-R, 12 Sep 95, Subject: Interim Army Policy on Natural Attenuation for Environmental Restoration.
   b. Memorandum, SFIM-AEC-IRP, 8 Feb 95, Subject: Revised Installation Restoration Program (IRP) Management Plan.

2. Policy: Approval thresholds for all DDs, including NPL RODs, are as described below. Signature authority for NPL RODs may not be delegated below a general officer or Senior Executive Service official. The only exception is that an installation commander, regardless of grade/rank, may sign NPL RODs selecting the no action alternative.

   a. The Director for Environmental Programs (DEP), Office of the Assistant Chief of Staff for Installation Management, approves all DDs, including NPL RODs, greater than $6 million.
   b. The MACOM commander approves DDs, including NPL RODs, between $2 million and $6 million.
   c. Installation commander approves DDs, including NPL RODs, less than $2 million.

3. Staffing Procedures (Schematic showing the process for staffing is at TAB A):

   a. RODs/DDs of more than $6M: Submit five copies of final RODs and other DDs needing DEP approval through command channels, including intermediate headquarters, to Headquarters, Department of the Army, Assistant Chief of Staff for Installation Management, ATTN: DAIM-ED-R, 600 Army Pentagon, Washington,

DC, 20310-0600. The Office of the Director, Environmental Programs (ODEP) will provide copies to the appropriate HQDA Staff elements for staffing.

REVISED INTERIM POLICY FOR STAFFING AND APPROVING DECISION DOCUMENTS (DDs) (cont)

(1) The signature on the endorsement memorandum at each level in the chain-of-command when forwarding the final ROD or DD to HQDA will be by someone with authority to sign for the commander.

(2) HQDA expects, that at a minimum, MACOMs obtain coordination from USAEC and USACHPMM and staff RODs with the staff environmental, legal, public affairs and medical authorities in the MACOM chain-of-command. Covering correspondence should say that the staffing within those MACOM offices was accomplished. Installations/executing agents may reproduce the suggested staffing matrix at TAB B for that purpose and include it when forwarding the ROD for approval.

b. All other RODs/DDs:

(1) Prior to signing NPL RODs, the MACOM or installation commander must coordinate the ROD with USAEC and USACHPPM.

(2) The Environmental Law Division of the Office Army Staff Judge Advocate (DAJA-EL) is available to assist the MACOMs and installations. Recommend MACOMs and installations use this service when staffing draft RODs and other DDs.

(3) Provide copies of signed DDs, including RODs, at a minimum, to each level in the chain-of-command below the approval authority and to the Commander, U.S. Army Environmental Center, ATTN: SFIM-AEC-IR, Aberdeen Proving Ground, MD, 21010-5401. The approving headquarters should also provide a copy of signed RODs to the Deputy Assistant Secretary of the Army, OASA(I,L&E), 110 Army Pentagon, Washington, DC 20310-0110. The transmittal memorandum for both notifications should include a short narrative summary describing the action and its relationship to other cleanup actions/operable units, degree of risk reduction, cost-benefit of the remedy, and technologies considered.

(4) Reference 1.a. requires consideration of natural attenuation as a remedial action alternative for all restoration decisions. c. A formal and description for DDs, other than RODs, is at TAB C.

4. Responsibilities:

a. This policy makes installations and MACOMs responsible for ensuring that DDs or RODs that commit the Army to future expenses pass the following checks:

(1) The project must be Defense Environmental Restoration Account (DERA) eligible (Attachment A, ref 1.b.)

(2) The installation Restoration or Formerly Used Defense Sites Workplans (current year), President's Budget (budget years), or Future Year Defense Plan (program

years) contain funding for the project. The fact that projects are in the Installation Action Plan and reported in the RCS 1383 Report is not enough. Projects must also be supported in the PPBES.

(3) The project conforms with priorities for risk reduction in program guidance.

b. The Army will not support funding DERA-ineligible projects with DERA funds. Installations will fund those projects with installation operating funds. Projects not complying with 4.a.(2) and (3) above may require renegotiation of agreements with regulators

4. Suspenses:

a. Cover letters should advise of any negotiated or imposed deadlines and allow sufficient time for staffing at each level in the chain-of-command. To assist planning, TAB A provides time required for staffing at each stage. Upon receipt of a ROD or DD at HQDA for staffing, allow for a minimum of two weeks for the Army Staff to get approval. Installations should plan accordingly and make regulators aware of these time constraints during negotiations.
b. For Base Realignment and Closure Fast Track Cleanup or situations when an Interagency Agreement or Federal Facilities Agreement deadline might be missed:

REVISED INTERIM POLICY FOR STAFFING AND APPROVING DECISION DOCUMENTS (DDs) (cont)

(1) The MACOM should convene a conference call with the installation, executing agency, ODEP, and Major Subordinate Command (if applicable) representatives.

(2) The conference call should result in an understanding of any deadlines and if and how the process can be expedited.

(3) For RODs/DDs over $6M, the installation or its executing agent should send a copy of the final ROD they forwarded to the MACOM via overnight or next day commercial delivery to ODEP to initiate the HQDA staffing process.

TAB A - DECISION DOCUMENT (including RODs) STAFFING PROCEDURE

TAB B - STAFFING MATRIX FOR DECISION DOCUMENTS (ROD/DD)

TAB C follows:

DECISION DOCUMENT

OUTLINE

1. PURPOSE OF REMEDIAL ACTION (INTERIM REMEDIAL OR CORRECTIVE ACTION) This decision document describes the remedial alternative (selected interim remedial action or corrective action) for the _____ (name of site) _____site at_____(installation) chosen in accordance with the CERCLA as amended by the SARA, the NCP, RCRA, and AR 200-1, as applicable.

Give a brief description and explanation of the site and how the problem poses a risk to human health and the environment. Briefly explain how the selected action will eliminate or reduce the risk to human health and the environment. (1 paragraph)
This decision document was developed by _____ (Agency) with support from _____ (State or EPA). Letters of concurrence (or signatures) from _____ (principals) are attached (if available)

2. SUMMARY OF SITE RISK
This section should briefly describe the results of any risk assessments or risk considerations at this site. Discussion should, at a minimum, address both Human Health Risks and Ecological Risk based on the contamination at the site, exposure pathways, known or potential health or ecological effects of contaminant, and overall risk which could result from the contamination at the site if no remedial action were taken. (1-2 paragraphs)

3. SUMMARY OF REMEDIAL ALTERNATIVES
This section should describe the remedial alternatives, the selected remedial alternative,- and a brief explanation/rationale of why the remedial method was selected. At a minimum, this section should briefly cover how this action fits into the overall site cleanup strategy, cost of alternative (s), description of the selected technology, and the expected goals or long-term effectiveness of the remedy. (1-2 paragraphs) if desired, or deemed necessary, reference any technical documents supporting this decision, i.e., "The alternative(s) summarized here are described in the remedial investigation and feasibility study (RI/FS) report dated_____which should be consulted for a more detailed description of all the alternatives.

4. PUBLIC/COMMUNITY INVOLVEMENT
This section should summarize the installations/sites community involvement program. At a minimum, describe any past community participation, and what steps will be taken in the future to facilitate public involvement. Please note that any future community involvement program at the installation shall conform with all applicable laws and DOD and Army Policy. For example: "It is DOD and Army policy to involve the local community as early as possible and throughout the IR process at an installation. To accomplish this, _____ (site name) has/is complying with the public participation requirements of CERCLA/SARA (Sections 113(K)(2)(A) and 117 ... (or other as applicable) and DOD and Army Policy by _____ (describe public involvement). Future community involvement at _____(site) will consist of _____(for future community involvement-see references) . (Army RAB Guidance dated 4/14/94, DOD DERP Management Guidance, dated 4/14/94 Section XII pg.18.) (1-2 paragraphs)

5. DECLARATION
See attached declaration statements. Choose the declaration statement that best describes the site and situation.

6. SIGNATURE PAGE
The appropriate signature for the Army is as follows:

- For actions up to 2 million dollars, the Installation Commander is the signature authority
- For actions between 2 and 6 million dollars, the MACOM is the signature authority
- For all actions over 6 million dollars the decision document must be submitted through the Army chain of command to the Director of Environmental Programs, Office of the Assistant Chief of Staff for Installation Management.

A copy of all decision documents must be provided to the U.S. Army Environmental Center.

DECLARATION STATEMENTS-SECTION 5

When the selected remedy satisfies the statutory preference for treatment as a principal element, by treating at least the principal threat(s) posed by the site, the declaration should state:

I. "The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable."

When the selected remedy for the site involves little or no treatment to reduce toxicity, mobility or volume of contaminants, that is, treatment is not utilized to address the principal threat(s) posed by the site, CERCLA requires a statement explaining why such a remedial action is not chosen. The declaration in this case should state:

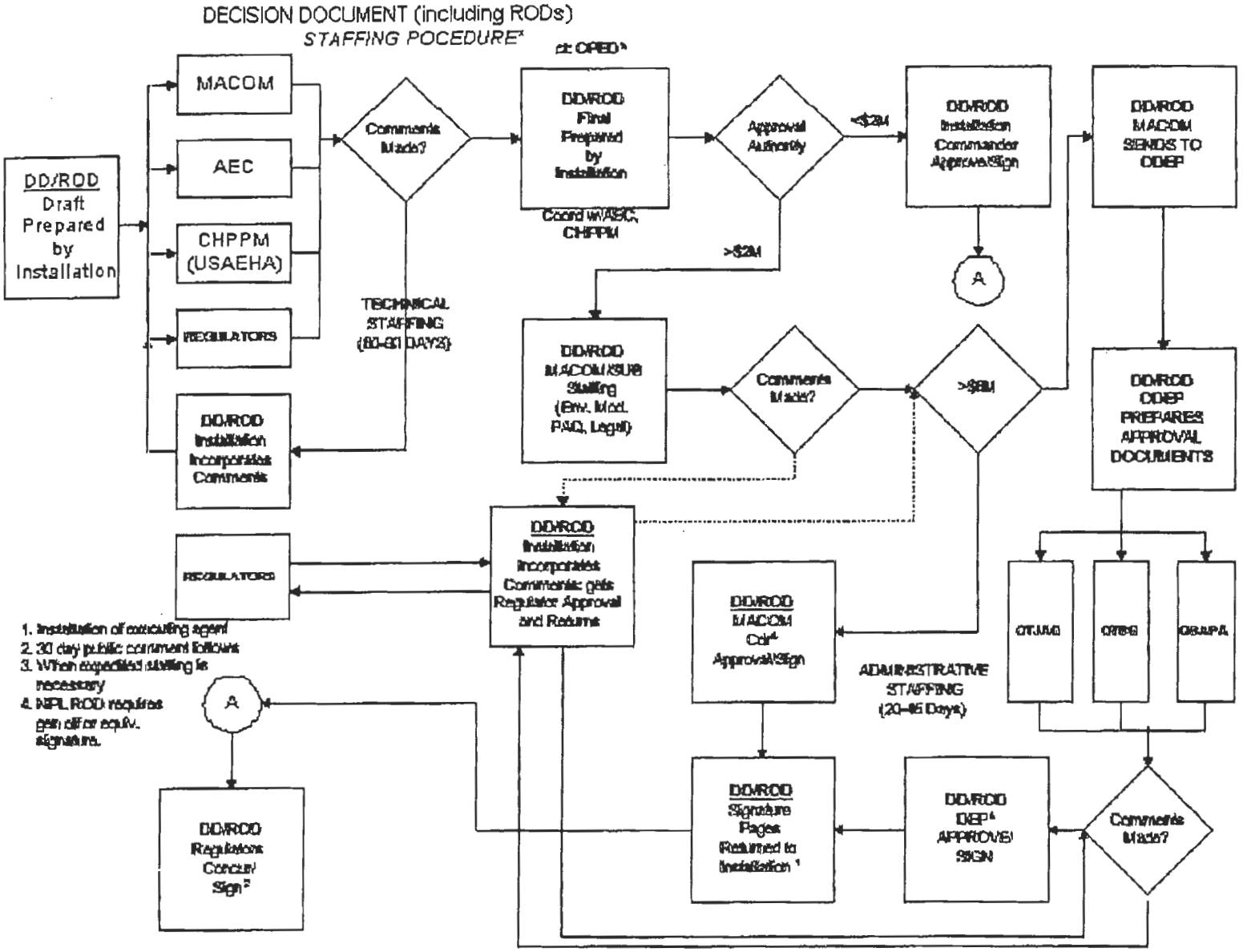
II. "The selected remedy is Protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"] , and is cost effective. This remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable for this site. However, because treatment of the principal threats of the site was not found to be practicable [or within the limited scope of this action"] , this remedy does not satisfy the statutory preference for treatment as a principal element of the remedy." This must be followed by the rationale for this finding based on the specific factors used to determine that treatment is either impracticable or not within the limited scope of this action. In addition, a brief statement that past or future operable units will meet the statutory preference for treatment should be included when appropriate.

If the remedy will leave hazardous substances on-site above health-based levels, the Declaration should include the following:

III. "Because this remedy will result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

If the remedy will not leave hazardous substances on-site above health-based levels, the Declaration should include the following:

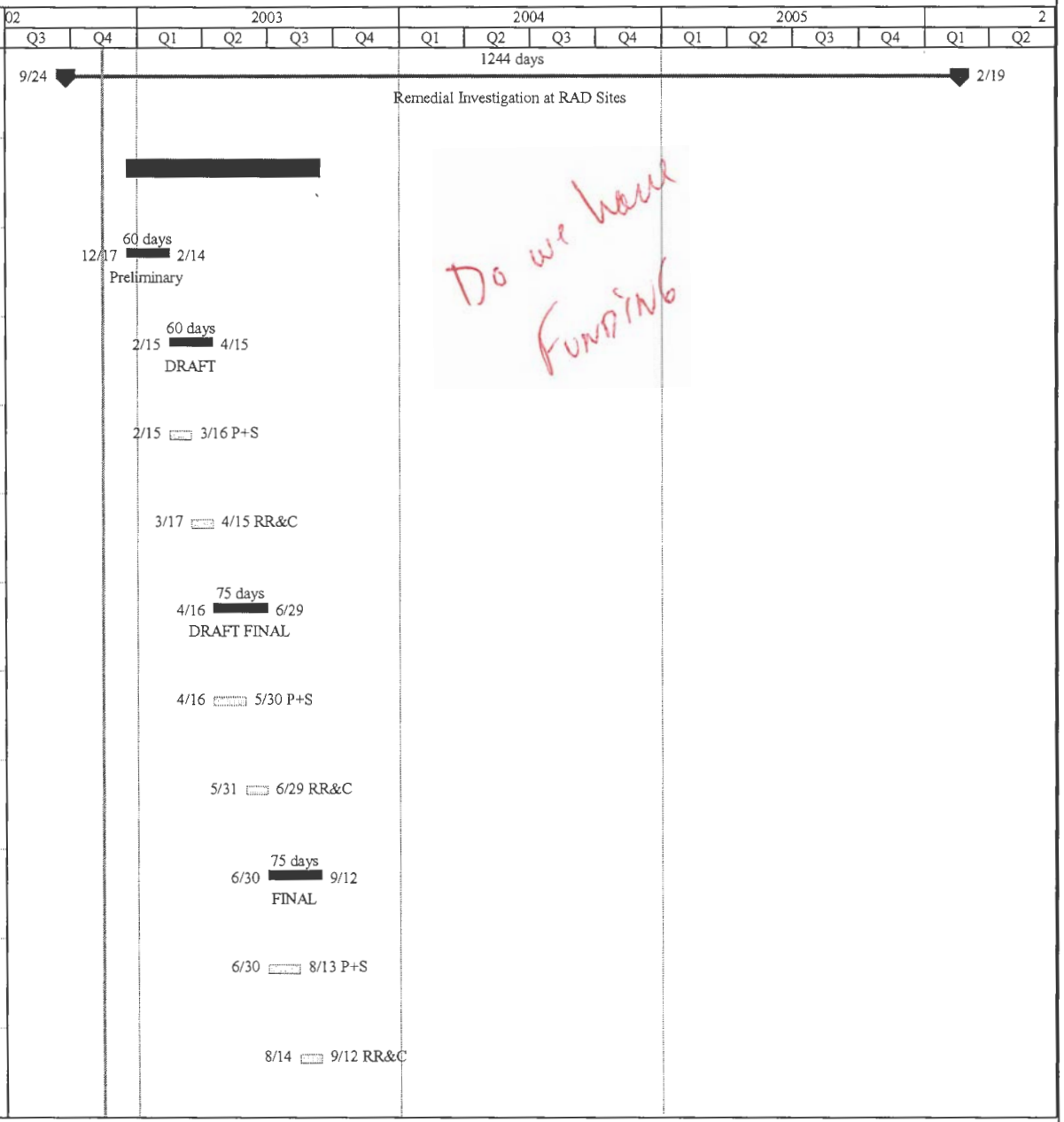
IV. "Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five-year review will not apply to this action".


DECISION DOCUMENT (including RODs)
STAFFING POCEDURE*
DD/ROD Draft Prepared by Installation
MACOM
AEC
CHPPM (USAEHA)
REGULATORS
Comments Made?
TECHNICAL STAFFING (60-81 DAYS)
DD/ROD Installation Incorporates Comments
DD/ROD Final Prepared by Installation
Coord w/ASIC, CHPPM
Approval Authority
<$2M
>$2M
DD/ROD Installation Commander Approve/Sign
A
DD/ROD MACOM SENDS TO ODEP
DD/ROD MACOM/SUB Staffing (Env. Mod. PAO, Legal)
Comments Made?
>$5M
DD/ROD ODEP PREPARES APPROVAL DOCUMENTS
DD/ROD Installation Incorporates Comments gets Regulator Approval and Returns
REGULATORS
DD/ROD MACOM Cdr[4] Approval/Sign
ADMINISTRATIVE STAFFING (20-45 Days)
OTJAG
OTIG
OGA/PA
1. Installation of consulting agent
2. 30 day public comment follows
3. When expedited staffing is necessary
4. NPL ROD requires gen off or equiv. signature.
A
DD/ROD Regulator Concur/ Sign[2]
DD/ROD Signature Pages Returned to Installation [1]
DD/ROD DEP[4] APPROVE/ SIGN
Comments Made?

9/e

Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05

ID	Task Name	Duration
1	Remedial Investigation at SEAD-12, Radioactive Waste Burial Sites	1244 days
2	**SUPPLEMENTAL REMEDIAL INVESTIGATION WORK PLAN**	270 days
3	**Army Preliminary Draft Work Plan**	60 days
7	**DRAFT Supplemental Work Plan**	60 days
8	Prepare and Submit (P+S) - DRAFT Supplemental Work Plan	30 days
11	Regulatory Review and Comment - DRAFT Supplemental Work Plan	30 days
16	**DRAFT FINAL Supplemental RI Work Plan**	75 days
17	Prepare and Submit (P+S) - DRAFT FINAL Supplemental RI Work Plan	45 days
20	Regulatory Review and Comment - DRAFT FINAL Supplemental RI Work Plan	30 days
25	**FINAL Supplemental RI Work Plan**	75 days
26	Prepare and Submit (P+S) - FINAL Supplemental RI Work Plan	45 days
29	Regulatory Review and Comment - FINAL Supplemental RI Work Plan	30 days

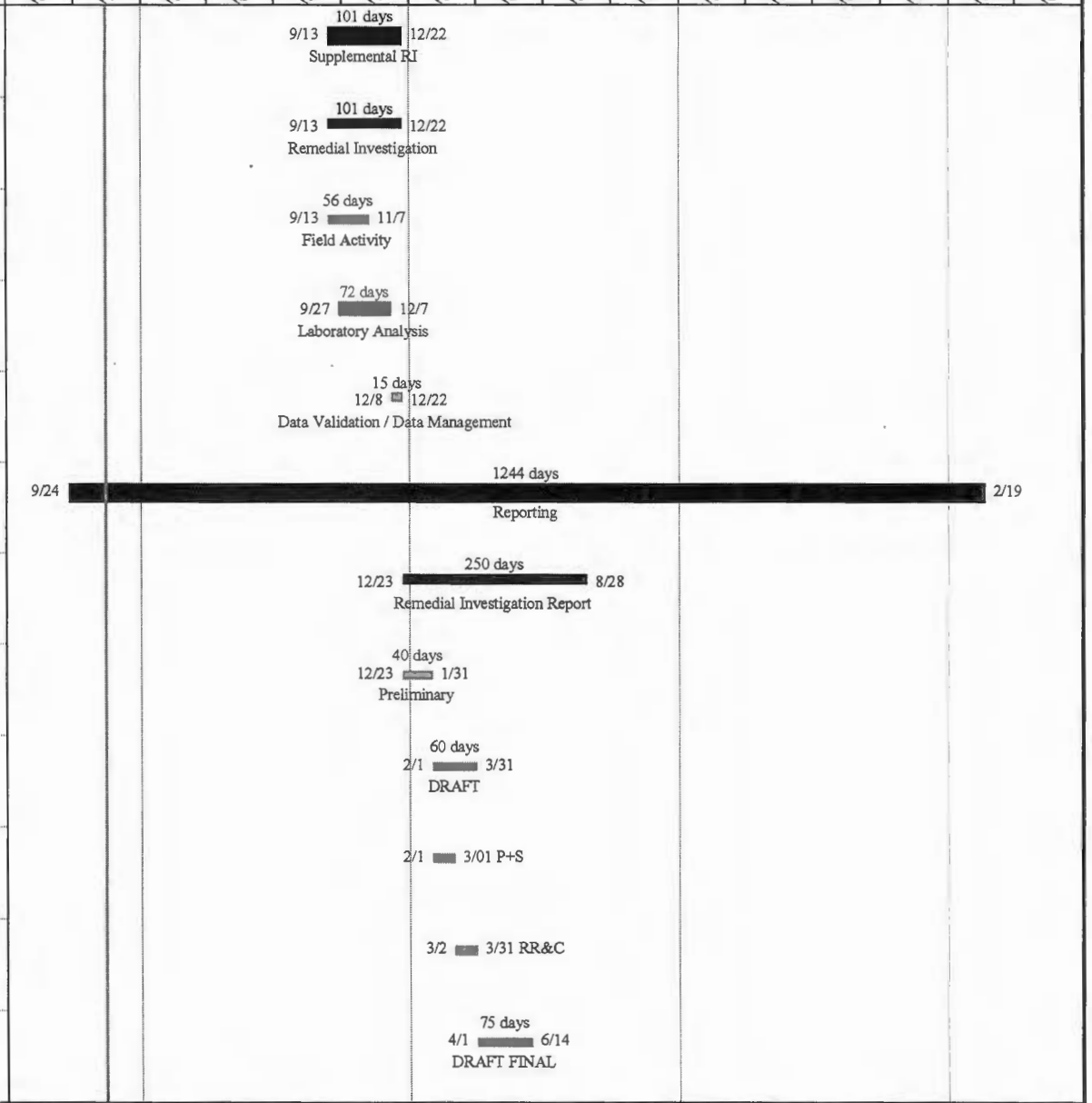


PARSONS

Tue 9/24/02 to Sun 2/19/06 - Total Duration: 1244 days

Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05

ID	Task Name	Duration
34	**SUPPLEMENTAL REMEDIAL INVESTIGATION**	101 days
35	**Remedial Investigation**	101 days
36	**Field Activity**	56 days
41	**Laboratory Analysis**	72 days
45	**Data Validation/Data Management**	15 days
47	**REPORTING**	1244 days
48	**SUPPLEMENTAL REMEDIAL INVESTIGATION (RI) REPORT**	250 days
49	**Army Preliminary Draft**	40 days
53	**DRAFT RI Report**	60 days
54	Prepare and Submit (P+S) - DRAFT SUPPLEMENTAL RI Report	30 days
57	Regulatory Review and Comment - DRAFT SUPPLEMENTAL RI Report	30 days
62	**DRAFT FINAL RI Report**	75 days

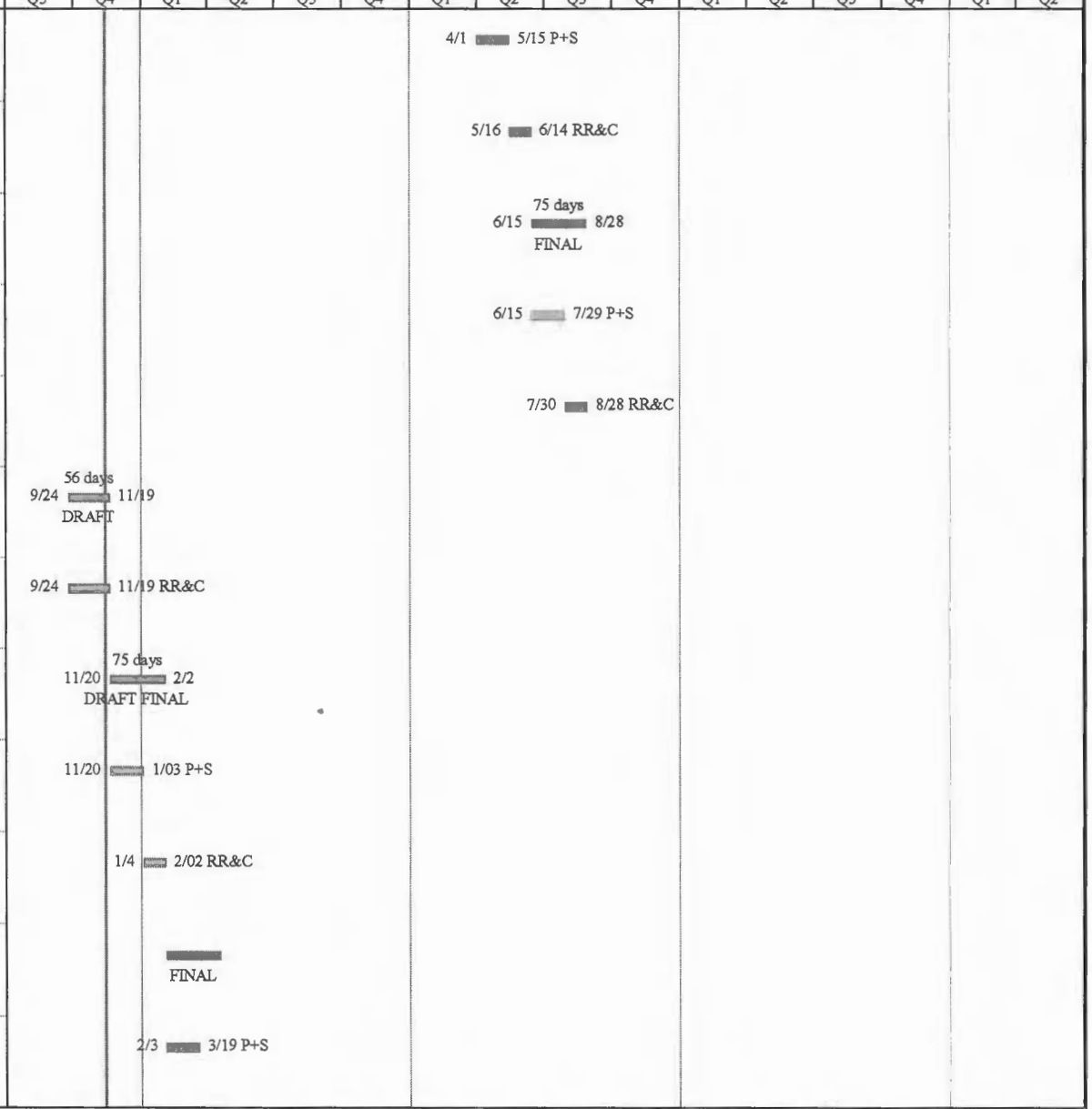


PARSONS

Tue 9/24/02 to Sun 2/19/06 - Total Duration: 1244 days

Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05

ID	Task Name	Duration
63	Prepare and Submit (P+S) - DRAFT FINAL SUPPLEMENTAL RI Report	45 days
66	Regulatory Review and Comment - DRAFT FINAL SUPPLEMENTAL RI Report	30 days
71	**FINAL SUPPLEMENTAL RI Report**	75 days
72	Prepare and Submit (P+S) - FINAL SUPPLEMENTAL RI Report	45 days
75	Regulatory Review and Comment - DRAFT SUPPLEMENTAL RI Report	30 days
80	**DRAFT BUILDING Report**	56 days
81	Regulatory Review and Comment - DRAFT BUILDING Report	56 days
84	**DRAFT FINAL BUILDING Report**	75 days
85	Prepare and Submit (P+S) - DRAFT FINAL BUILDING Report	45 days
88	Regulatory Review and Comment - DRAFT FINAL BUILDING Report	30 days
93	**FINAL BUILDING Report**	75 days
94	Prepare and Submit (P+S) - FINAL BUILDING Report	45 days

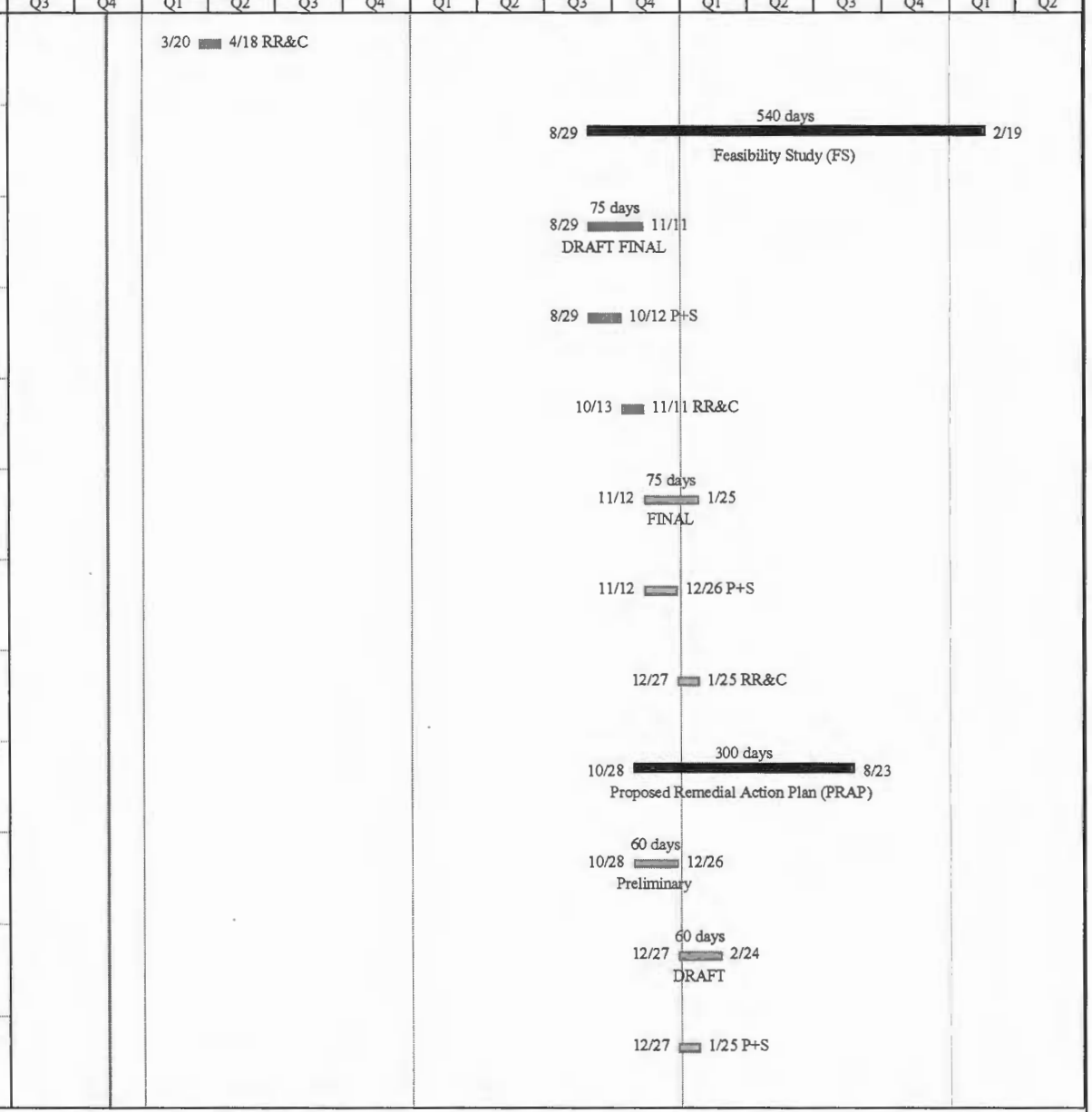


PARSONS

Tue 9/24/02 to Sun 2/19/06 - Total Duration: 1244 days

Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05

ID	Task Name	Duration
97	Regulatory Review and Comment - DRAFT BUILDING Report	30 days
102	**FEASIBILITY STUDY (FS) REPORT**	540 days
103	**DRAFT FINAL FS Report**	75 days
104	Prepare and Submit (P+S) - DRAFT FINAL FS Report	45 days
107	Regulatory Review and Comment - DRAFT FINAL FS Report	30 days
112	**FINAL FS Report**	75 days
113	Prepare and Submit (P+S) - DRAFT FS Report	45 days
116	Regulatory Review and Comment - FINAL FS Report	30 days
121	**PROPOSED REMEDIAL ACTION PLAN (PRAP)**	300 days
122	**Army Preliminary DRAFT PRAP**	60 days
126	**DRAFT PRAP**	60 days
127	Prepare and Submit (P+S) - DRAFT PRAP	30 days

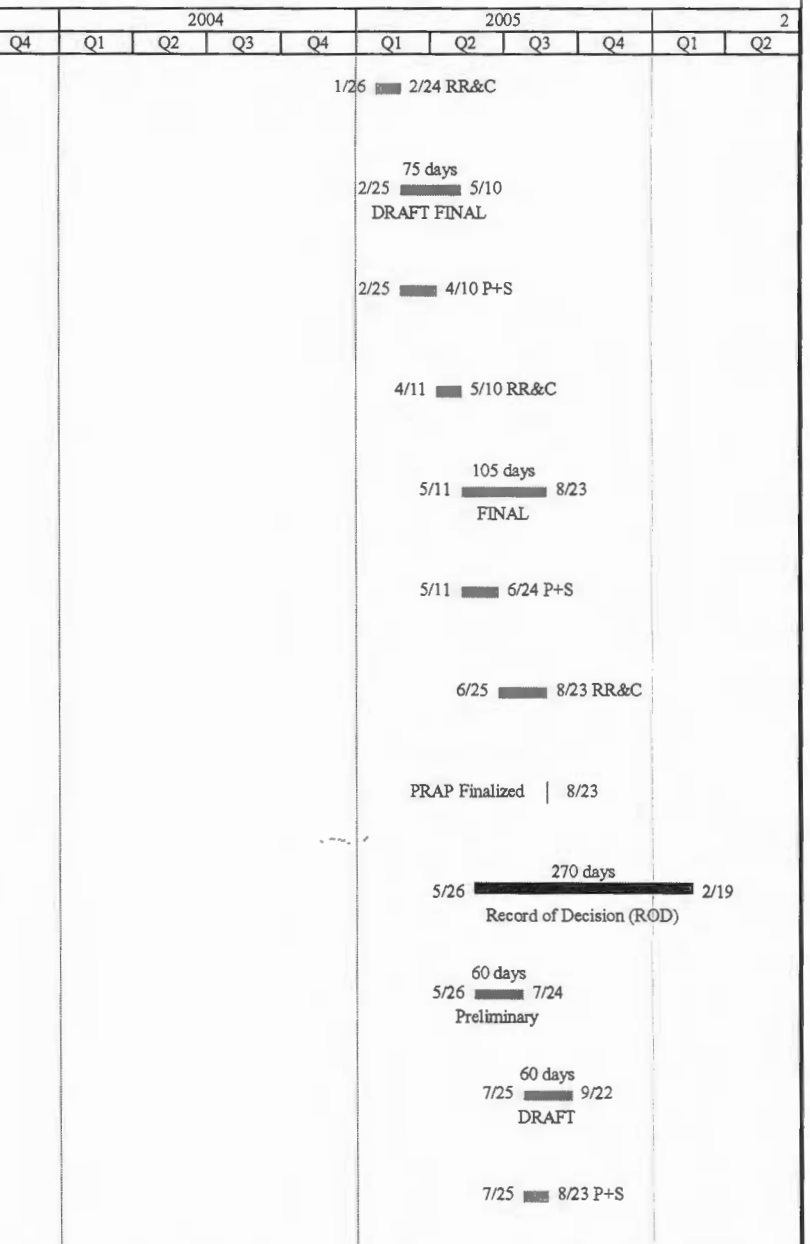


PARSONS

Tue 9/24/02 to Sun 2/19/06 - Total Duration: 1244 days

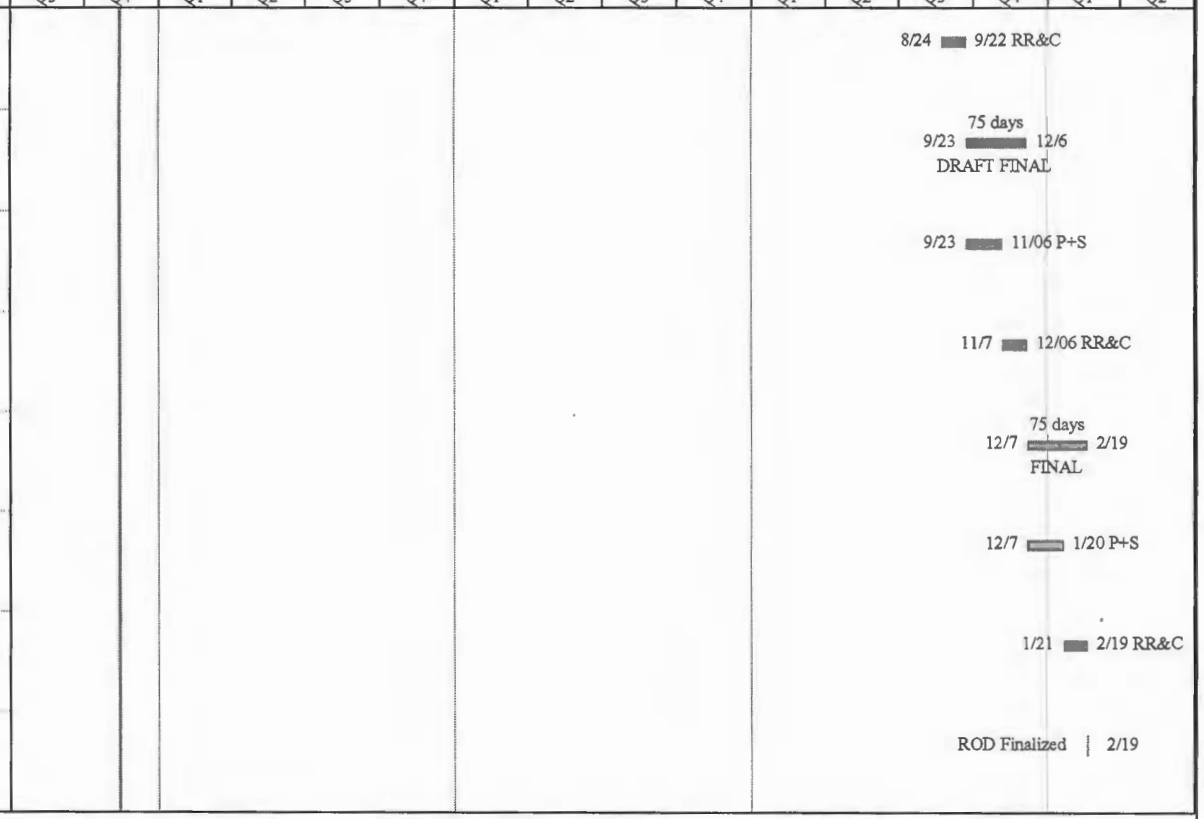
Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05

ID	Task Name	Duration
130	Regulatory Review and Comment - DRAFT PRAP	30 days
135	**DRAFT FINAL PRAP Report**	75 days
136	Prepare and Submit (P+S) - DRAFT FINAL PRAP	45 days
139	Regulatory Review and Comment - DRAFT RI Report	30 days
144	**FINAL PRAP**	105 days
145	Prepare and Submit (P+S) - FINAL PRAP	45 days
148	Regulatory Review and Comment - FINAL PRAP	60 days
158	**PRAP FINAL**	0 days
160	**RECORD OF DECISION (ROD)**	270 days
161	**Army Preliminary DRAFT ROD**	60 days
165	**DRAFT ROD**	60 days
166	Prepare and Submit (P+S) - DRAFT ROD	30 days

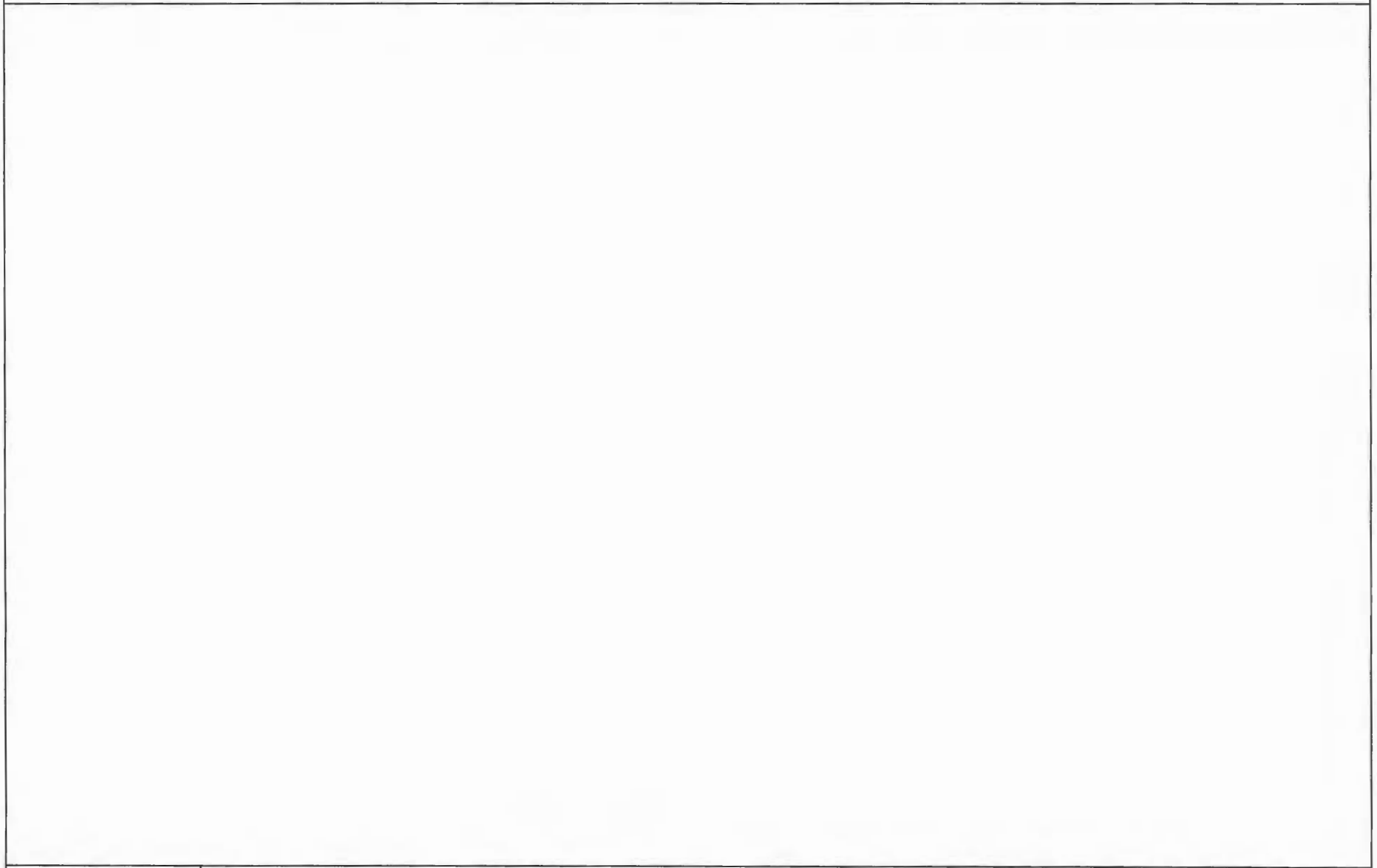


Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05

ID	Task Name	Duration
169	Regulatory Review and Comment - DRAFT ROD	30 days
174	**DRAFT FINAL ROD**	75 days
175	Prepare and Submit (P+S) - DRAFT FINAL ROD	45 days
178	Regulatory Review and Comment - DRAFT RI Report	30 days
183	**FINAL ROD**	75 days
184	Prepare and Submit (P+S) - FINAL ROD	45 days
187	Regulatory Review and Comment - FINAL ROD	30 days
192	**ROD FINAL**	0 days



Tentative Schedule for Radiological Sites - SEAD-12
Delivery Order # 05



Project: sead12
Date: Wed 11/13/02

Summary
Major Task
SubTask
Detail Task
Milestone
Split
Progress
Rolled Up Split
Rolled Up Milestone
Rolled Up Progress
External Tasks
Project Summary
External Milestone
Deadline

PARSONS

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