

40-8767



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY OPERATIONS SUPPORT COMMAND (PROV)
1 ROCK ISLAND ARSENAL
ROCK ISLAND, IL 61299-6000

REPLY TO
ATTENTION OF:

July 10, 2000

Safety/Rad Waste Team

Mr. Stewart Brown
Low-Level Waste and
Decommissioning Projects Branch
U.S. Nuclear Regulatory Commission
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards
Washington, D.C. 20555-0001

Dear Mr. Brown:

We request a schedule extension for our Area 10 decommissioning activities. The Commission approved the Lake City Army Ammunition Plant, Area 10 decommissioning plan on, August 25, 1998. In accordance with Title 10, Code of Federal Regulations, paragraph 40.42, we need to complete our decommissioning activities by August 25, 2000, or adequately justify the need for a delay.

Our Area 10 decommissioning activities have become much more complicated due to the increased volume of contaminated materials, additional contaminants, and additional regulatory involvement. We have removed most of the source term (depleted uranium) from Area 10; however, we still have over 800,000 cubic feet of material that has the potential to be radiologically contaminated. We know that this 800,000 cubic feet of material contains hazardous levels of lead. In addition to being a Nuclear Regulatory Commission Site Decommissioning Management Plan site, the Environmental Protection Agency has designated Area 10 as a Comprehensive Environmental Restoration, Compensation and Liability Act Superfund Site.

MMSSD/Public

There are several other sites at Lake City that the Environmental Protection Agency and the State of Missouri have determined pose a greater risk to human health and are higher priorities for clean-up. The most recently developed (by the Army, the Lake City operating contractor, the Environmental Protection Agency, and the State of Missouri) schedule for expenditure of Army funds projects funding for the Area 10 remediation in the year 2008. Interim steps include funding for a feasibility study in 2003, and remediation plan development in 2007.

The Environmental Protection Agency and the State of Missouri have said that we cannot segregate, screen, or sort the mixed waste materials without an approved Resource Conservation and Recovery Act permit or an approved Comprehensive Environmental Restoration, Compensation and Liability Act remediation plan. We suggest the Commission consider the possibility of transferring regulatory oversight of Area 10 to the Environmental Protection Agency as you did for the Lake City firing range impact areas.

We suggest a meeting with the Commission, the Army, the Environmental Protection Agency, and the State of Missouri to discuss the handling of this site.

Our point of contact for questions or comments is Mr. Mike Styvaert, AMSOS-SF, (309) 782-0880, electronic mail address amsos-sf@osc.army.mil.

Sincerely,

//signed//

Rosalene E. Graham
Chief, Safety/Rad Waste Team

Enclosure

Copy Furnished:

Lieutenant Colonel Ronald Alberto, Commander,
Lake City Army Ammunition Plant, Independence,
Missouri 64051-0330

Commander, Lake City Army Ammunition Plant, Attention:
SIOLC-EN/Mr. Garth Anderson, Independence,
Missouri 64051-0330

U.S. Environmental Protection Agency, Attention:
Mr. Scott Marquess, Project Manager, Region VII,
Federal Facilities and Special Emphasis Branch,
Superfund Division, 726 Minnesota Avenue, Kansas
City, Kansas 66101

State of Missouri, Department of Natural Resources,
Hazardous Waste Program, Mr. Mitch Scherzinger,
1730 East Elm Street, Jefferson City, Missouri 65101

U.S. Nuclear Regulatory Commission, Region III,
Attention: Mr. Bruce Jorgensen, Decommissioning
Branch, Lisle, Illinois 60532

**LAKE CITY AAP
AREA 10**

31 MAY 00

ID	Task Name	Duration	Start	Finish	Predecessors
1	Investigation Report	334 days	Mon 10/1/01	Fri 8/30/02	
2	Prepare Draft Report	120 days	Mon 10/1/01	Mon 1/28/02	
3	Submit Draft Report	1 day	Tue 1/29/02	Tue 1/29/02	2
4	Review Draft Report	90 days	Wed 1/30/02	Mon 4/29/02	3
5	Submit review comments	1 day	Tue 4/30/02	Tue 4/30/02	4
6	Revise Draft Report	60 days	Wed 5/1/02	Sat 6/29/02	5
7	Submit Draft Final Report	1 day	Sun 6/30/02	Sun 6/30/02	6
8	Review Draft Final Report	60 days	Mon 7/1/02	Thu 8/29/02	7
9	Regulator Concurrence	1 day	Fri 8/30/02	Fri 8/30/02	8
10	EE/CA	455 days	Sat 8/31/02	Fri 11/28/03	
11	Prepare Army Draft EE/CA	120 days	Sat 8/31/02	Sat 12/28/02	9
12	Review EE/CA	60 days	Sun 12/29/02	Wed 2/26/03	11
13	Submit Army Review Comments	1 day	Thu 2/27/03	Thu 2/27/03	12
14	Revise EE/CA	60 days	Fri 2/28/03	Mon 4/28/03	13
15	Submit Draft EE/CA	1 day	Tue 4/29/03	Tue 4/29/03	14
16	Review EE/CA	90 days	Wed 4/30/03	Mon 7/28/03	15
17	Submit Review Comments	1 day	Tue 7/29/03	Tue 7/29/03	16
18	Revise Draft EE/CA	60 days	Wed 7/30/03	Sat 9/27/03	17
19	Submit Draft Final EE/CA	1 day	Sun 9/28/03	Sun 9/28/03	18
20	Review EE/CA	60 days	Mon 9/29/03	Thu 11/27/03	19
21	EE/CA Regulator Concurrence	1 day	Fri 11/28/03	Fri 11/28/03	20
22	Action Memorandum	501 days	Sat 11/29/03	Tue 4/12/05	
23	Prepare Army Draft Action Memo	120 days	Sat 11/29/03	Sat 3/27/04	21
24	Review Action Memo	60 days	Sun 3/28/04	Wed 5/26/04	23
25	Submit Army Review Comments	1 day	Thu 5/27/04	Thu 5/27/04	24
26	Revise Action Memo	60 days	Fri 5/28/04	Mon 7/26/04	25
27	Submit Draft Action Memo	1 day	Tue 7/27/04	Tue 7/27/04	26
28	Review Action Memo	60 days	Wed 7/28/04	Sat 9/25/04	27
29	Submit Review Comments	1 day	Sun 9/26/04	Sun 9/26/04	28
30	Revise Draft Action Memo	60 days	Mon 9/27/04	Thu 11/25/04	29
31	Submit Draft Final Action Memo	1 day	Fri 11/26/04	Fri 11/26/04	30
32	Review Action Memo	60 days	Sat 11/27/04	Tue 1/25/05	31
33	Action Memo Regulator Concurrence	1 day	Wed 1/26/05	Wed 1/26/05	32
34	Public Comment Period	30 days	Thu 1/27/05	Fri 2/25/05	33
35	Public Meeting	1 day	Fri 2/11/05	Fri 2/11/05	34SS+15 days
36	Sign Action Memo	60 days	Sat 2/12/05	Tue 4/12/05	35
37	Removal Action Design	455 days	Mon 1/8/07	Sun 4/6/08	
38	Prepare Army Draft RAMP	120 days	Mon 1/8/07	Mon 5/7/07	
39	Review RAMP	60 days	Tue 5/8/07	Fri 7/6/07	38
40	Submit Army Review Comments	1 day	Sat 7/7/07	Sat 7/7/07	39
41	Revise RAMP	60 days	Sun 7/8/07	Wed 9/5/07	40
42	Submit Draft RAMP	1 day	Thu 9/6/07	Thu 9/6/07	41
43	Review RAMP	90 days	Fri 9/7/07	Wed 12/5/07	42
44	Submit Review Comments	1 day	Thu 12/6/07	Thu 12/6/07	43
45	Revise Draft RAMP	60 days	Fri 12/7/07	Mon 2/4/08	44
46	Submit Draft Final RAMP	1 day	Tue 2/5/08	Tue 2/5/08	45
47	Review RAMP	60 days	Wed 2/6/08	Sat 4/5/08	46
48	RAMP Regulator Concurrence	1 day	Sun 4/6/08	Sun 4/6/08	47
49	Removal Action Construction	1 day	Tue 8/5/08	Tue 8/5/08	48FS+120 days