



DEPARTMENT OF THE ARMY
US ARMY ENVIRONMENTAL CENTER
5179 HOADLEY ROAD
ABERDEEN PROVING GROUND, MD 21010-5401

SFIMM-AEC-CD

25 October 2006

MEMORANDUM FOR DIRECTOR, MS. ROSALENE E. GRAHAM, SAFETY/RAD
WASTE DIRECTORATE, 1 ROCK ISLAND ARSENAL, ROCK ISLAND, IL 61299-6000

SUBJECT: Remedial Path for Lake City Army Ammunition Plant (LCAAP), Area 10

1. As discussed in our conference call of 27 September 2006, the US Army Environmental Center is still committed to addressing Area 10 under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and in coordinating the cleanup with your office to develop cost effective, jointly-funded cleanup. In October 2005, the Federal Facilities Agreement (FFA) parties met and agreed that a Remedial Investigation/Feasibility Study (RI/FS) was more appropriate at this point in time in lieu of a non time critical removal action. As part of the RI, a baseline risk assessment was conducted. It is our intent to address the risk identified in the baseline risk assessment. Although pre-decisional, at this point we envision the response action to involve limited excavation of areas of high lead concentration to return the site to an average soil concentration under the calculated industrial risk-based concentration for lead. Any depleted uranium (DU) encountered during the excavation will be disposed of in accordance with regulatory requirements. Environmental Restoration funding will be used for completing the feasibility study, proposed plan, record of decision, and remedial design efforts and for remediation associated with the lead risk-based cleanup.

2. As agreed in our conversation, it is our intent to also address removal of DU under the CERCLA Record of Decision and identify the driver for that part of the response as the Nuclear Regulatory Commission permit termination provisions. Costs for this part of the response action are to be funded by your office.

3. Prior agreements for cost sharing were based on a plan to conduct a removal action without regard to risk. Now that the risks have been defined, Environmental Restoration funds cannot be used to address cleanup that is not eligible for the Installation Restoration Program.

4. The Army submitted the Remedial Investigation Report, including the risk assessment to the FFA parties for review and comment as required under the FFA on 11 September 2006. Alternatives for addressing Area 10 will be further defined during the Feasibility Study, including costs associated with the lead and DU response actions.

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5. If you have any further questions, please contact me at 410-436-1537.

FOR THE COMMANDER:



JAMES D. DANIEL
Chief, Cleanup Division

CF:

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