

LONGHORN ARMY AMMUNITION PLANT

KARNACK, TEXAS

ADMINISTRATIVE RECORD

VOLUME 6 of 10

1995

**Bate Stamp Numbers
015324 - 015375**

Prepared for:

**Department of the Army
Longhorn Army Ammunition Plant
Marshall, Texas 75671-1059**

1995

**LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS
ADMINISTRATIVE RECORD - CHRONOLOGICAL INDEX**

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1995

- A. Title:** Letter - Subject: Draft Work Plan For Phase III of Interim Remedial Action at Burning Ground No. 3 and UEP, LHAAP 18 & 24 for Longhorn Army Ammunition Plant - Transmittal of Full-Size Drawings
Group(s): Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
Location: Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Mr. H. L. Jones, Texas Natural Resource Conservation Commission
Agency: U. S. Army Corps Of Engineer
Author(s): Darrell W. Chinn, Captain, U.S. Army
Date: June 29, 1995
Bate Stamp: 015324
- B. Title:** Letter - Subject: Final Record of Decision for Early Interim Remedial Action at Landfill Sites 12 and 16
Group(s): Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Lisa Marie Price, Remedial Project Manager, Superfund Texas Enforcement
Date: July 10, 1995
Bate Stamp: 015325
- C. Title:** Letter - Subject: Final Record of Decision for Early Interim Remedial Action at Landfill Sites 12 and 16
Group(s): Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: July 10, 1995
Bate Stamp: 015326
- D. Title:** Letter - Subject: Final Record of Decision for Early Interim Remedial Action at Landfill Sites 12 and 16
Group(s): Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
Location: Longhorn Army Ammunition Plant, Marshall, Texas

**LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS
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1995

Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army Investigation Section
Recipient: Mr. H. L. Jones, Texas Natural Resource Conservation Commission
Date: July 10, 1995
Bate Stamp: 015327

- E. Title: Public Meeting - Subject: No Further Action Proposal for Sites 13 & 14 for Longhorn Army Ammunition Plant
Group(s): 3
Site(s): LHAAP-13 Suspected TNT Burial Between Active Landfill And Old Landfill
LHAAP-14 Area 54 Burial Ground
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): U.S. Army Corps of Engineers
Recipient: U.S. Public
Date: July 18, 1995
Bate Stamp: 015328-015352
- F. Title: Letter - Subject: Transmittal of Revised Air Monitoring Plan, Appendix C to Draft Chemical Data Acquisition Plan, Phase III of Interim Remedial Action at Burning Ground No. 3 Longhorn Army Ammunition Plant
Group(s): Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
Location: Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Agency: U. S. Army Corps Of Engineer
Author(s): Darrell W. Chinn, Captain, U.S. Army
Date: July 25, 1995
Bate Stamp: 015353
- G. Title: Letter - Subject: Request for 20-day Extension for Reviewing and Commenting on General Work Plan Interim Remedial Action at Burning Ground No. 3 Longhorn Army Ammunition Plant
Group(s): Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
Location: Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Mr. David Tolbert, Project Manager, Longhorn Army Ammunition Plant
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: July 25, 1995
Bate Stamp: 015354

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- H.** **Title:** **Letter - Subject: Transmittal of Final Record of Decision for Early Interim Remedial Action at Landfill Sites 12 and 16,**
 Group(s): **Landfill Caps Interim Action**
 Site(s): **LHAAP-12 Active Landfill**
 LHAAP-16 Old Landfill
 Location: **Longhorn Army Ammunition Plant, Marshall, Texas**
 Agency: **Department of The Army, Longhorn Army Ammunition Plant**
 Author(s): **Darrell W. Chinn, Captain, U.S. Army**
 Recipient: **Lisa Marie Price, Remedial Project Manager, Superfund Texas Enforcement**
 Date: **July 27, 1995**
 Bate Stamp: **015355**
- I.** **Title:** **Letter - Subject: Preliminary Design for Interim Remedial Action at Landfill Sites 12 and 16**
 Group(s): **Landfill Caps Interim Action**
 Site(s): **LHAAP-12 Active Landfill**
 LHAAP-16 Old Landfill
 Location: **Longhorn Army Ammunition Plant, Marshall, Texas**
 Agency: **Department of The Army, Longhorn Army Ammunition Plant**
 Author(s): **Darrell W. Chinn, Captain, U.S. Army**
 Recipient: **Lisa Marie Price, Remedial Project Manager, Superfund Texas Enforcement**
 Date: **July 27, 1995**
 Bate Stamp: **015356**
- J.** **Title:** **Letter - Subject: Preliminary Design for Interim Remedial Action at Landfill Sites 12 and 16**
 Group(s): **Landfill Caps Interim Action**
 Site(s): **LHAAP-12 Active Landfill**
 LHAAP-16 Old Landfill
 Location: **Longhorn Army Ammunition Plant, Marshall, Texas**
 Agency: **Department of The Army, Longhorn Army Ammunition Plant**
 Author(s): **Darrell W. Chinn, Captain, U.S. Army**
 Recipient: **Michael A. Moore, RI / FS II Unit, Superfund Investigation Section**
 Date: **July 27, 1995**
 Bate Stamp: **015357**
- K.** **Title:** **Letter - Subject: Preliminary Design for Interim Remedial Action at Landfill Sites 12 and 16**
 Group(s): **Landfill Caps Interim Action**
 Site(s): **LHAAP-12 Active Landfill**
 LHAAP-16 Old Landfill
 Location: **Longhorn Army Ammunition Plant, Marshall, Texas**
 Agency: **Department of The Army, Longhorn Army Ammunition Plant**

**LONGHORN ARMY AMMUNITION PLANT
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1995

Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Mr. H. L. Jones, Texas Natural Resource Conservation Commission
Date: July 27, 1995
Bate Stamp: 015358

- L. Title:** Memorandum for Commander - Subject: Review of Draft Work Plan for Phase III Interim Remedial Action at Burning Ground No. 3 and UEP, LHAAP 18 & 24, Volumes 1-5 , Longhorn Army Ammunition Plant, Prepared by Dow Environmental, 23 June 1995
- Group(s):** Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
- Location:** Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Jonna Polk, U.S. Army Corps of Engineers, Tulsa District
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Arthur P. Lee, P.E., Program Manager, Health Risk Assessment and Risk Communication, Department of the Army
Date: July 28, 1995
Bate Stamp: 015359
- M. Title:** Letter - Subject: Comments on General Work Plan Interim Remedial Action at Burning Ground No. 3 Longhorn Army Ammunition Plant, Section 3: Soil and Source Material Excavation, Treatment and Disposal Plan
- Group(s):** Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
- Location:** Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Mr. David Tolbert, Project Manager, Longhorn Army Ammunition Plant
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: July 31, 1995
Bate Stamp: 015360-015361
- N. Title:** Letter - Subject: Request for Extension for Reviewing Preliminary Design for Interim Remedial Action at Landfill Sites 12 and 16
- Group(s):** Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
- Location:** Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: August 1, 1995
Bate Stamp: 015362

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- O. Title: Letter - Subject: Preliminary Design for Interim Remedial Action at Landfill Sites 12 and 16**
Group(s): Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: August 1, 1995
Bate Stamp: 015363
- P. Title: Letter - Subject: Design Work Plan Interim Remedial Action at Burning Ground No. 3 Longhorn Army Ammunition Plant**
Group(s): Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
Location: Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Mr. David Tolbert, Project Manager, Longhorn Army Ammunition Plant
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Lisa Marie Price, Remedial Project Manager, Superfund Texas Enforcement
Date: August 1, 1995
Bate Stamp: 015364
- Q. Title: Letter - Subject: Final Hydrogeological Assessment Report for LHAAP**
Group(s): All - Hydrogeological Assessment, Soil and Groundwater Background Studies
Site(s): General
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Mr. Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Recipient: Mr David Tolbert, Project Manager, Longhorn Army Ammunition Plant
Date: August 1, 1995
Bate Stamp: 015365
- R. Title: Letter - Subject: Change in Address**
Group(s): All
Site(s): General
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Lisa Marie Price, Remedial Project Manager, Superfund Texas Enforcement
Recipient: Mr. David Tolbert, Project Manager, Longhorn Army Ammunition Plant
Date: August 1, 1995
Bate Stamp: 015366

**LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS
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- S. Title: Memorandum - Subject: Early Interim Remedial Action Record of Decision (ROD) at Landfill Sites 12 and 16, Longhorn Army Ammunition Plant**
Group(s): Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Mr. Robert Radkiewicz, U.S. Army Industrial Operations
COL M. Potter, U.S. Army Material Command
Mr. M. Vogt, 600 Army Pentagon
Date: August 2, 1995
Bate Stamp: 015367
- T. Title: Letter - Subject: Transmittal of Draft Phase II Sumps Investigation Sample and Data Report Volumes 1-5 for Longhorn Army Ammunition Plant**
Group(s): 4
Site(s): LHAAP-35 Process Wastewater Sumps - Various
LHAAP-36 Explosive Waste Pads
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Lisa Marie Price, Environmental Protection Agency
Date: August 9, 1995
Bate Stamp: 015368
- U. Title: Letter - Subject: Transmittal of Draft Phase II Sumps Investigation Sample and Data Report Volumes 1-5 for Longhorn Army Ammunition Plant**
Group(s): 4
Site(s): LHAAP-35 Process Wastewater Sumps - Various
LHAAP-36 Explosive Waste Pads
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Mr. Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: August 9, 1995
Bate Stamp: 015369

**LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS
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- V. Title:** Letter - Transmittal of Groups 2 & 4 Baseline Risk Assessment Work Plans, Minutes for July 19, 1995 Risk Assessment Concept Scoping Meeting for Longhorn Army Ammunition Plant
Group(s): 2 & 4
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
LHAAP-17 No. 2 Flashing Area / Burning Ground
LHAAP-18 & LHAAP 24 Burning Ground / Washout Pond & Evaporation Pond
LHAAP-29 Former TNT Production Area
LHAAP-32 Formal TNT Waste Disposal Plant
LHAAP-35 Process Wastewater Sumps - Various
LHAAP-36 Explosive Waste Pads
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Lisa Marie Price, Environmental Protection Agency
Date: August 9, 1995
Bate Stamp: 015370
- W. Title:** Letter - Groups 2 & 4 Baseline Risk Assessment Work Plans, Minutes for July 19, 1995 Risk Assessment Concept Scoping Meeting for Longhorn Army Ammunition Plant
Group(s): 2 & 4
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
LHAAP-17 No. 2 Flashing Area / Burning Ground
LHAAP-18 & LHAAP 24 Burning Ground / Washout Pond & Evaporation Pond
LHAAP-29 Former TNT Production Area
LHAAP-32 Formal TNT Waste Disposal Plant
LHAAP-35 Process Wastewater Sumps - Various
LHAAP-36 Explosive Waste Pads
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Mr. Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: August 9, 1995
Bate Stamp: 015371
- X. Title:** Letter - Groups 2 & 4 Baseline Risk Assessment Work Plans, Minutes for July 19, 1995 Risk Assessment Concept Scoping Meeting for Longhorn Army Ammunition Plant
Group(s): 2 & 4
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
LHAAP-17 No. 2 Flashing Area / Burning Ground
LHAAP-18 & LHAAP 24 Burning Ground / Washout Pond & Evaporation Pond
LHAAP-29 Former TNT Production Area

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KARNACK, TEXAS
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1995

**LHAAP-32 Formal TNT Waste Disposal Plant
LHAAP-35 Process Wastewater Sumps - Various
LHAAP-36 Explosive Waste Pads**
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department Of The Army, Longhorn Army Ammunition Plant
Author(s): Darrell W. Chinn, Captain, U.S. Army
Recipient: Mr. H. L. Jones, Texas Natural Resource Conservation Commission
Date: August 9, 1995
Bate Stamp: 015372

Y. Title: Letter - Subject: Comments on General Work Plan Interim Remedial Action at Burning Ground No. 3 Longhorn Army Ammunition Plant, Section 3: Soil and Source Material Excavation, Treatment and Disposal Plan
Group(s): Early Interim Action At Burning Ground No. 3
Site(s): LHAAP-18 & LHAAP-24 Burning Ground / Washout Pond & Unlined Evaporation Pond
Location: Longhorn Army Ammunition Plant, Karnack, Texas
Recipient: Mr. David Tolbert, Project Manager, Longhorn Army Ammunition Plant
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Michael A. Moore, RI / FS II Unit, Superfund Investigation Section
Date: August 10, 1995
Bate Stamp: 015373-015374

Z. Title: Letter - Subject: Proposed Record of Decision (ROD) at Landfill Sites 12 and 16, Longhorn Army Ammunition Plant
Group(s): Landfill Caps Interim Action
Site(s): LHAAP-12 Active Landfill
LHAAP-16 Old Landfill
Location: Longhorn Army Ammunition Plant, Marshall, Texas
Agency: Department of The Army, Longhorn Army Ammunition Plant
Author(s): Dan Pearson, Executive Director, Texas Natural Resource Conservation Commission
Recipient: Mr. Myron O. Knudson, P.E. , Director Superfund Division, U.S. Environmental Protection Agency
Date: August 14, 1995
Bate Stamp: 015375



DEPARTMENT OF THE ARMY
LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059



REF: V TO
ATTENTION OF

June 29, 1995

SMCLO-EN

015324

Mr. H.L. Jones
Texas Natural Resource Conservation Commission
2916 Teague Drive
Tyler, Texas 75701

SUBJECT: Draft Work Plan for Phase III of the Interim Remedial
Action, Burning Ground No. 3 and UEP, LHAAP 18 & 24 for Longhorn
Army Ammunition Plant in Karnack, Texas - Full-Size Drawings

Dear Mr. Jones:

Enclosed is one copy of the subject drawing. The drawing was
inadvertently left out of the package, sent to you on 27 June
1995, which transmitted the subject Draft Work Plan.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

[Signature]
Darrrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosure



ONLY TO
ATTENTION OF

LONGHORN LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059

3650542719186697235

P.03



July 10, 1995

015325

SMCLO-EN

Ms. Lisa Price
Superfund Enforcement
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

SUBJECT: Final Record of Decision for Early Interim Remedial
Action at Landfill Sites 12 & 16 for Longhorn Army Ammunition
Plant in Marshall, Texas

Dear Ms. Price:

Enclosed is one copy of the Final Record of Decision for
Early Interim Remedial Action at Landfill Sites 12 & 16 for
Longhorn Army Ammunition Plant in Marshall, Texas.

Also enclosed is a cover and spine label for Volume II Final
Hydrogeological Assessment Appendices.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

for *W. Chinn*
Dartell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



LONGHORN LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059



REPLY TO
ATTENTION OF:

015326

July 10, 1995

SMCLO-EN

Mr. Michael Moore
Superfund Investigation Section
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

SUBJECT: Final Record of Decision for Early Interim Remedial
Action at Landfill Sites 12 & 16 for Longhorn Army Ammunition
Plant in Marshall, Texas

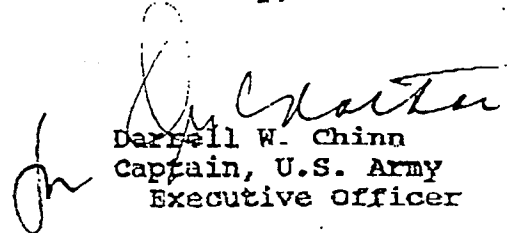
Dear Mr. Moore:

Enclosed are two copies of the Final Record of Decision for
Early Interim Remedial Action at Landfill Sites 12 & 16 for
Longhorn Army Ammunition Plant in Marshall, Texas.

Also enclosed is a cover and spine label for Volume II Final
Hydrogeological Assessment Appendices.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,


Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



DEPARTMENT OF THE ARMY
LONGHORN LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75871-1059



REPLY TO
ATTENTION OF

July 10, 1995

015327

SMCLO-EN

Mr. H.L. Jones
Texas Natural Resource Conservation Commission
2916 Teague Drive
Tyler, Texas 75701

SUBJECT: Final Record of Decision for Early Interim Remedial
Action at Landfill Sites 12 & 16 for Longhorn Army Ammunition
Plant in Marshall, Texas

Dear Mr. Jones:

Enclosed is one copy of the Final Record of Decision for
Early Interim Remedial Action at Landfill Sites 12 & 16 for
Longhorn Army Ammunition Plant in Marshall, Texas.

Also enclosed is a cover and spine label for Volume II Final
Hydrogeological Assessment Appendices.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

fu
D. W. Chinn
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures

LONGHORN ARMY AMMUNITION PLANT (LHAAP)

015323

NO FURTHER ACTION PROPOSAL FOR SITES 13 AND 14

Tuesday, July 18, 1995
7:00 o'clock P.M.
Karnack High School

~~ORIGINAL~~

1 MR. BROCK: I would like to welcome you here
2 to the cafeteria at Karnack High School. My name is John
3 Brock. I am the High School Principal here. If there is
4 any way that I can assist you while you are here at this
5 meeting, please feel free to ask me. I will be serving as
6 your moderator here tonight.

7 What we will do tonight is have a short presentation
8 about the sites under discussion. After that, there will
9 be a time of questions and answers. I would ask you when
10 we begin the question and answer period, please be sure to
11 identify yourself before you ask the question and in the
12 interest of time, we would like to keep the question and
13 the answer to that question to about five minutes.

14 It may seem strange to begin by talking about the
15 ending, but we will try to end this meeting around 9:00
16 o'clock. If it looks like at 9:00 o'clock lots of
17 discussion is ongoing, we will stop and see if we can reach
18 a consensus to continue. If not, the meeting will be
19 officially adjourned but we will hang around and try to
20 clear up any questions that we might have at that time.

21 At this time I would like to turn the program over to
22 Captain Chinn who is the Executive Officer at Longhorn Army
23 Ammunition Plant and he will introduce the participants of
24 tonight's discussion.

25 CAPTAIN CHINN: As Mr. Brock said, my name

1 is Captain Darrell Chinn. I am the Executive Officer of
2 the ammunition plant and with the departure of Colonel Sowa
3 on the 27th of June, I have taken over the role of
4 Environmental Coordinator for the plant.

5 So, as this process goes on, then we will become more
6 familiar with one another. But I would like to welcome
7 each one of you and appreciate your participation tonight
8 in the meeting.

9 And I would like to introduce a few of our key players
10 that are involved in the environmental restoration. We
11 will start out with the personnel from TNRCC. That is the
12 Texas Natural Resource Conservation Commission. That is
13 Mike Moore here, Diane Poteet, Allison Jenkins and Bud
14 Jones. And also from my headquarters in the environmental
15 office is Cyril O. Onewokae and he is from Rock Island,
16 Illinois and a part of the Army Engineering Staff is Steve
17 Nolan and Loretta Turner. The Longhorn Plant Environmental
18 Specialist is David Tolbert.

19 At this time, what I am going to do is turn it over to
20 David and he is going to go over the - - the situation with
21 the proposed plan with Sites 13 and 14.

22 DAVID TOLBERT: I would also like to again
23 thank Mr. Brook for letting us use this facility for - - is
24 it the third time?

25 As the Captain said, I am David Tolbert. I am the

1 point of contact for the installation. I am the
2 Environmental Restoration Program Manager. And if there is
3 any questions, my name and address is in the pamphlet.

4 At this time I would like to - - for those of you who
5 are new here - - would like to mainly just go through where
6 we stand and how we got here so far.

7 The investigation of the plant initially started in
8 1976. The plant itself was put on the NPL, National
9 Priorities List, in August of 1990. Then in December of
10 1991, the Army, EPA - Environmental Protection Agency, -
11 Texas National Resource Conservation Commission went into a
12 Federal Facilities Agreement which really kicked the ball
13 off as far as action going on at the plant.

14 The sites that we are going to talk about tonight,
15 sites 13 and 14, the investigation actually began in 1992,
16 June 1992.

17 A little bit about how we have gotten here so far.
18 The last two public meetings were interim remedial actions,
19 that's mainly because we had not completed the RI/FS which
20 is the second phase beginning with investigation and
21 feasibility studies.

22 We started that prior to the RI/FS, if you will, and
23 the interim remedial action. This time, we are following
24 the total process where we completed the RI/FS in June and
25 we distributed by hand and sent out 1350 fact sheets about

1 what we are doing here tonight. Now, we are at the public
2 meeting. Normally, it is a pretty long, drawn out process
3 but it is a process we have to go through. I feel like we
4 have accomplished a lot with the two interim actions and
5 the proposed plan we have here tonight.

6 After the public meeting tonight, we will have a
7 comment period which is listed in your pamphlet and then we
8 will address the comments into the ROD, Record Of Decision,
9 and send it forward for signature.

10 And now a little about site 13. First of all, sites
11 13 and 14 are basically in the center of the plant. If you
12 get a chance, look at the layout of the plant and you will
13 see that both sites are more or less in the center.

14 Site 13 is an undocumented site, undocumented one time
15 TNT burial site. Other than the undocumented burial, this
16 site has had no activities on it since then. In June of
17 1995, we finished the remedial investigation, both the soil
18 and the ground water, and the results of those basically
19 is, that there was no contaminants detected. And so, no
20 action is required on the site.

21 On this next slide you will see a picture of site 13.
22 You can see the well where we took the ground water. We
23 did soil bores to determine the soil content and here
24 again, this is actually a right-of-way in the back area
25 coming out of the wooded area. This is Site 13.

1 Site 14, this is also an undocumented burial site. It
2 was supposedly used for demolition of debris, building
3 materials, explosives, acid waste in the 1940s and 50s.
4 Since then there has been a parking lot put on it. And the
5 remedial investigation was completed on it in 1995 also.

6 Excuse me. I have a head cold. If you can't hear me
7 or understand me, tell me and I will try to help you out.

8 The soil and the ground water was tested and no
9 contamination associated with this area was found. And
10 this is the site - - we are actually standing on the
11 asphalt taking these pictures, looking out so you can see
12 the ground on the site itself.

13 The next analysis - - uh - - an evaluation of all
14 potential risks to human health - - uh - - and the
15 environment of the site, contaminants - - was conducted as
16 the risks analysis.

17 The evidence showed no evidence of contaminant
18 release. There were no chemicals identified. And no risks
19 associated with past activities. That is the reason why
20 me, the Army, the Environmental Protection Agency and TNRCC
21 concluded that no further action was required.

22 That basically concludes the show tonight. At this
23 time I would like to turn this back over to Captain
24 Chinn for follow-up.

25 CAPTAIN CHINN: All right. David pretty much

1 summarized what is going on in Sites 13 and 14. What I
2 would like to do now and go ahead and let you know what is
3 the next step in this process. And that is, that we are
4 right now in the middle of a public comment period. As the
5 slide indicates, the public comment period ends on August
6 6th and in your folders, if you will turn to the very last
7 page in your folders, there's a form that we filled out
8 that has already been pre-addressed on the back side. So,
9 this form is designed for you to go ahead and write all the
10 comments or questions that you have on this form and then
11 put your name on it, obviously is optional, but if you want
12 something back out of us, obviously, you need to do that.

13 If you will go ahead and fill that out any time during
14 the public comment period and go ahead and mail it to us
15 since it is already pre-addressed. If you want more copies
16 of this, we can accommodate this, that is no problem. But,
17 it is essential that you get these in to us by August 6th.

18 As you note, tonight is our public meeting. And then,
19 as the comments, if for some reason you want to write a
20 letter or correspondence or something of that nature, in a
21 different format, you can address it as it is indicated
22 here on the slide, % of Dave Tolbert and myself, either
23 way.

24 Now, some people may feel that, well, I have a
25 question and I don't think it is that significant. That's

1 not really a reason for not filling this out and sending it
2 in. Any comments that are going to be - - that we receive,
3 they will be taken into consideration when we do the record
4 of decision as David indicated.

5 So, any comments that you have that pertain to this,
6 if you will just fill out the form and get us a copy of it
7 and each comment will be taken into consideration when we
8 do the record of decision.

9 At this time, I appreciate Mr. Brock, the Principal of
10 Karnack. I know he is a busy man even though this is the
11 summer period, we appreciate you taking time out and
12 allowing us to use the facility and I am going to turn it
13 over to you for the question and answer period.

14 MR. BROCK: Again, as we go into the
15 question and answer period, the focus of this meeting is
16 Sites 13 and 14. Other concerns you have must be addressed
17 outside of this meeting. That is not to discourage you
18 from asking those questions but during the official part of
19 this meeting you need to keep your questions and comments
20 to these particular sites and we have a five minute period
21 for the question and the response.

22 Try to give everybody the opportunity to comment and
23 before you give a comment or ask a question, please
24 identify yourself so everyone can get to know each other a
25 little better.

1 Now, are there any questions?

2 Yes, Ma'am?

3 GAIL MASTERS: My name is Gail Masters.

4 What exactly - - what type of contaminants are you looking
5 for, or run-off or soil contaminant or TNT?

6 CAPTAIN CHINN: What is your name again?

7 GAIL MASTERS: Gail Masters from the Karnack
8 area.

9 CAPTAIN CHINN: Okay.

10 Loretta, you want to address that?

11 LORETTA TURNER: The contaminants we're
12 looking for waste acid disposal, explosives, metals, and
13 we were testing water quality - - (inaudible) we analyzed
14 soil and ground water.

15 GAIL MASTERS: How far do they test - - do
16 they go out from the site to test? Do you know?

17 LORETTA TURNER: They try to draw based on
18 interviews, how large a site they thought it was at the
19 time (inaudible). They try to go from that and essentially
20 sometimes initial field screens are used to see if they
21 don't detect any within where the suspected site was.
22 There is no reason to go any further.

23 RUTH CULVER: I'm Ruth Culver. I believe
24 there were like three core samples taken from each
25 suspected landfill site, is that correct? It was three?

1 CAPTAIN CHINN: Yes. Four of one and three
2 at 14.

3 RUTH CULVER: Would you repeat that, please?

4 LORETTA TURNER: It was four at 13 and three
5 at 14.

6 RUTH CULVER: So, in determining whatever
7 the parameters of an area is, how do you decide within that
8 area where you are going to take these core samples from?

9 LORETTA TURNER: It is pretty much random,
10 especially at these two sites since they were undocumented.
11 And the size and location of these sites were not known.

12 RUTH CULVER: So then, how deep do you go to
13 take these cores? How big is this thing?

14 CAPTAIN CHINN: Are you talking about the
15 soil samples?

16 RUTH CULVER: Yes.

17 LORETTA TURNER: It's the size of an auger,
18 I believe. Six inch diameter holes and drilled to 25 to 30
19 feet depending if they hit ground water.

20 MR. BROCK: Yes.

21 RICK MICHAELS: My name is Rick Michaels.
22 When you say "suspected site," that site is a suspected
23 site because someone - - past employee or someone like that
24 says, hey, I remember at some point in time they poured
25 something out there or we stored something there? Do you

1 have any other documentation of the sites other than that?

2 DAVID TOLBERT: No. Totally undocumented.

3 RUTH CULVER: No aerial or - -

4 DAVID TOLBERT: Someone said, I remember
5 something being dumped there. That is all we had to go on.

6 LORETTA TURNER: Aerial photos were utilized
7 in some of the initial investigations. Here, some note of
8 something was there, don't know what. Some kind of change
9 in the land surface from '50 to '70. The trees were gone.
10 Nothing ever really seen (inaudible).

11 RICK MICHAELS: Do you have some type of
12 record or a library or display of the aerial photos that
13 are being used in this process that one could pull from
14 time to time as needed? Whatever photo database you are
15 using?

16 DAVID TOLBERT: In 1980, (inaudible) did the
17 initial study and they did a lot of background work. There
18 is in Thiokol's library a group of pictures dating back to
19 '58.

20 • RICK MICHAELS: Aerial photos?

21 DAVID TOLBERT: Aerial photos.

22 RICK MICHAELS: Is that open to the public?

23 DAVID TOLBERT: Yeah. Contact me and I will
24 get it for you. That is why we found some of the other
25 sites - - sites detected from the pictures.

1 RUTH CULVER: Is that the Thiokol library or
2 the Longhorn library?

3 DAVID TOLBERT: Actually it is upstairs in
4 the Thiokol library.

5 MR. BROCK: Yes, sir.

6 BILL ROBERTSON: My name is Bill Robertson.
7 Do you all have any speculation as to what happened to the
8 material that was supposedly dumped here since there seems
9 to be no evidence even under the ground?

10 LORETTA TURNER: We didn't find anything.
11 We have no evidence anything was put there. Someone
12 remembered maybe when something was put there. The
13 reliability of the worker that worked here thirty or forty
14 year ago, (inaudible).

15 DAVID TOLBERT: The location of these two
16 sites, 13 and 14, you know, is very close to the old
17 landfill site 16 and someone may have been unsure of what
18 side of the railroad tracts this happened on. That is the
19 basis of our conclusions.

20 BILL ROBERTSON: So, a "wild goose chase"
21 sounds like a phrase that may have been used in this
22 investigation?

23 DAVID TOLBERT: Those are the things we have
24 to follow up on. A wild goose chase is not (Inaudible).

25 JIM BOLING: I am Jim Boling. When you say

1 undocumented, do you mean there is no - - like some dated
2 statement that where somebody has recorded that "x" said
3 this about that place?

4 DAVID TOLBERT: No.

5 JIM BOLING: Hearsay?

6 DAVID TOLBERT: Actually where someone was
7 instructed to dump or there was a site specifically for
8 dumping. The only thing we have documented is when we
9 interviewed the person themselves.

10 JIM BOLING: You know who said that? I am
11 not asking who it is.

12 DAVID TOLBERT: I am assuming they would
13 have said something but I am not sure.

14 CAPTAIN CHINN: Mr. Robertson, the question
15 that you had, it may appear to be a wild goose chase. The
16 thing is, when they did the preliminary assessment back in
17 1980, the people conducting the assessment, if they felt it
18 was a credible source, that person, felt that they were a
19 part of this operation at the time this dumping took place,
20 then obviously, it would be prudent on our part to go and
21 do an investigation to see if there is anything there. It
22 wouldn't be right for us to just dismiss it as being - -
23 you know, just secondhand or hearsay information. That is
24 why this process takes place. We go ahead and do the
25 ground water sample and the soil sampling just to verify

1 that the - - any validity to the comments.

2 STEVE NOLAN: It is better to search and
3 find nothing, than not to search and find out twenty years
4 from now that there was.

5 BILL ROBERTSON: With regard to the bare
6 patches that show up on site 13, do these types of bare
7 patches show up elsewhere on the plant site?

8 DAVID TOLBERT: Like right now are you
9 talking about or back - -

10 BILL ROBERTSON: At the present time.

11 DAVID TOLBERT: That is hard to answer
12 because I haven't been over this entire facility. Any
13 sites that have now been looked at, I can say there is
14 growth on them now, on sites 13 and 14. As far as the
15 entire facility, I have no way of knowing.

16 JIM BOLING: Were the bare patches
17 themselves analyzed?

18 STEVE NOLAN: Yes.

19 JIM BOLING: What do those analyses tell you
20 about those patches of ground that show no vegetation?

21 STEVE NOLAN: Chemical analysis is what I
22 am talking about. There is no contamination.

23 JIM BOLING: No explanation at all for the -

24 -

25 RUTH CULVER: Again, I am Ruth Culver.

1 David, I think it was you that mentioned that there were
2 approximately 1,350 notices mailed out?

3 DAVID TOLBERT: Fact sheets?

4 RUTH CULVER: Yes. Along with the notice of
5 the meeting, right?

6 DAVID TOLBERT: Yes. The fact sheet and a
7 cover letter from Captain Chinn.

8 RUTH CULVER: What area do you mail that to?

9 DAVID TOLBERT: Everyone in this zip code
10 area.

11 RUTH CULVER: 75661?

12 DAVID TOLBERT; Yes.

13 RUTH CULVER: My question is, why is that all
14 of the repository information is put in the Marshall
15 Library? If we are not including those people?

16 DAVID TOLBERT: We also have records in my
17 office for people in this zip code.

18 RUTH CULVER: But, it is very difficult to
19 get to your office through the gates and everything.

20 I would like to make a suggestion that if the Karnack
21 School is agreeable, that you utilize the library that they
22 have here, and place that information in the library since
23 it is basically for this community. I would like to see it
24 more accessible.

25 Now, I am not saying that you should remove it from

1 Marshall. You know, I know that it is very expensive to
2 produce some of these documents. But, I would like - -

3 DAVID TOLBERT: I Could probably move mine.

4 RUTH CULVER: Yeah. Because we are really
5 targeting this community, I really feel that the
6 information should be available to the community and I
7 think it would be - -

8 MR. BROCK: I have no problem at all with
9 the filing of the papers here. I don't know how much
10 documentation we are talking about. Just so we don't
11 negatively impact the kid's (inaudible).

12 DAVID TOLBERT: The access may be a little
13 hard here during the summer. And weekends.

14 RUTH CULVER: That is just something to
15 consider because we do mainly target this area.

16 With us tonight is Wilma Zuber who is the technical
17 adviser who has been hired to assist the community through
18 the SuperFund process and she spoke today at the Marshall
19 Lions Club and there were thirty plus people there and some
20 of them were a little incensed that they had not been
21 noticed. But I reminded them that notices has run in the
22 paper properly. That they were there. A lot of times
23 people have a tendency not to read those. It is not like
24 something came to their home notifying them of this, you
25 know, and stating that this was like a called meeting. I

1 am not saying you should mail to all of Marshall.

2 DAVID TOLBERT: They way we handled that - -

3 RUTH CULVER: Uh-huh.

4 DAVID TOLBERT: Like from the first meeting
5 and the second meeting, everyone that attends the meeting,
6 I send a proposed (inaudible). Like everyone here tonight,
7 the next meeting, I will send a proposed (inaudible). That
8 is what I use for my base.

9 RUTH CULVER: But if they miss a meeting
10 though, do you go back?

11 DAVID TOLBERT: I still use the entire - -
12 the last meeting, we had what - - sixty? I sent out sixty
13 of the proposed (inaudible). The same way with the TNRCC
14 meeting.

15 RUTH CULVER: I am not trying to criticize.
16 I am just saying - -

17 DAVID TOLBERT: (Inaudible).

18 (There is laughter)

19 CYRIL ONEWOKAE: (Inaudible)

20 DAVID TOLBERT: Yes. It fills up a lot of
21 my office space.

22 MR. BROCK: Any other questions or comments?

23 WILMA ZUBER: I would like to be last.

24 RUTH CULVER: I have one more comment then,
25 if I could quickly. This is so that it will be part of the

1 record to make sure that one of the things that I am real
2 interested in seeing happen - - David and I talked about
3 this - - seeing to it that community workers are utilized.
4 David sent me from Dow, some of the businesses that are
5 being used but I just want to encourage that at any point
6 in time that local people can be utilized out on the plant,
7 since so many of them have been displaced, that we do that.

8 DAVID TOLBERT: That is one emphasis that we
9 put on contractors to instruct their sub-contractors to
10 hire locals.

11 UNKNOWN: It is very hard for people in a
12 real highly technical field - - like some of this stuff
13 that is going on out here, to hire local people. Not the
14 fact that they are not necessarily qualified, but they are
15 not schooled in the correct procedure to do the things that
16 they would have to do on this particular site. A lot of
17 times it takes people - - you know - - months to get to the
18 point to where they can walk onto the job site, after they
19 have had their (inaudible) training, the supervisory
20 training, you know, proper sample collection and
21 techniques.

22 RUTH CULVER: We are talking about dirt
23 haulers here.

24 UNKNOWN: Let me tell you something, you
25 would be surprised at what it takes for a dirt hauler to go

1 around those jobs. You don't just run up there and flag
2 down somebody because they have got a dump truck. They
3 have to be a little bit more qualified than that.

4 But that sounds good.

5 RUTH CULVER: I know, it sounds good.

6 MR. BROCK: Anyone else?

7 WILMA ZUBER: My name is Wilma Zuber. The
8 comments I am going to present tonight are based on a very
9 limited review of the data. I received a copy of the
10 documents on Friday of last week.

11 One of the issues is that at these two locations, the
12 groundwater is very near the surface. In some cases it
13 shows it as five, to seven, to eight feet under the ground.

14 If the suspected waste such as explosive compounds,
15 acidic waste, contaminated demolition and herbicide waste
16 were previously dumped at the site, the potential is there
17 for contamination - - contamination that would impact the
18 groundwater.

19 The borings that were reported from these two
20 locations range from a depth of five to thirty-five feet.
21 None, not one single boring, encountered any visible signs
22 of waste or contamination at either site.

23 As has been stated earlier, at one of the sites four
24 borings were performed and at the other site, three borings
25 were performed. After a limited review, it is my opinion

1 that additional borings should have been performed to
2 further investigate the possibility of waste material at
3 the sites.

4 The contractor or whoever prepared the report,
5 actually delineated the extent of each site, or the
6 potential extent of each site, and it is quite a bit larger
7 than the area where the borings were performed.

8 Some type of process such as a grid should have been
9 established over the extent of both sites and borings
10 performed to determine whether or not they encountered any
11 visible traces.

12 Site 13 was described as having bare spots. Five bare
13 patches were actually delineated on the site map. I think
14 that additional analysis of the parameters should be
15 performed in order to determine what caused the lack of
16 vegetation in the area called bare spots.

17 In addition, soils at site 13 exceeded the background
18 level for chromium and nickel. Now, these levels were not
19 judged to be high enough to be a risk factor but they were
20 higher than background.

21 At site 14, the chemicals that exceeded background
22 were barium, chromium and nickel. The source of these
23 contaminants should have been identified as part of this
24 limited investigation.

25 In the proposed plan in the RI/FS report

1 recommendations was made that no further action be
2 performed at these two locations and a no further decision
3 document be prepared for each of these two sites.

4 The report also recommended that the sites be removed
5 from further consideration. I think these are pre-mature
6 at this point. Prior to making the final decision on no
7 further action, additional studies should be performed at
8 each of these two sites. Additional borings should be
9 performed at each of the two sites to further investigate
10 the possibility of physical waste material buried in these
11 sites.

12 If physical waste is determined, then chemical
13 analysis of the ground water should be performed similar to
14 ones performed on the four and three borings.

15 Additional chemical parameters should be performed on
16 the soil located in the bare spots. These analysis should
17 determine without a doubt what caused the lack of vegetated
18 growth.

19 Currently, the data appears to be inadequate to make a
20 final decision of no further actions and recommendation
21 that the sites be removed from further consideration.

22 Thank you.

23 DAVID TOLBERT: I guess I will address that.
24 The bulk of the question, I would like to have the risk
25 people respond to once they get a chance to review your

1 question. But when we are talking about that one site that
2 is maybe 130 feet by 115 feet, you make it look like
3 (inaudible) at the end. My opinion as far as the two sites
4 go, I think we have done enough. And I will let my risk
5 evaluation people answer your questions and get back to you
6 as soon as we have it answered, if that is okay?

7 MR. BROCK: Any further comments or
8 questions?

9 DAVID TOLBERT: One other comment going back
10 to that question. I know there is an extreme research that
11 we can do, but also, we are looking to do the best job in
12 what the Army allows within the budget, not putting safety
13 at risk and that is the one thing that we are strongly
14 striving for, human health and anyway, I just wanted to
15 make that comment. And that we are doing everything we can
16 as far as that.

17 MR. BROCK: Any other comments?

18 BUD JONES: May I make a comment?

19 MR. BROCK: Sure.

20 BUD JONES: I am Bud Jones with TNRCC,
21 Region V. And one thing that I would like to say is when
22 you have got an area of that size, if you have got
23 contamination of a magnitude you are suspecting, you will
24 find it if you tap ground water because you have got
25 information stations within the rocks and when you hit the

1 top of that ground water table and go down, all these
2 spaces are filed with water. If you have got significant
3 contamination there, if you are anywhere in the ball park,
4 then you will pick up contamination.

5 Usually you start from a central area and you
6 establish the fact that there is contamination if there is,
7 then you go out like you have been referring to earlier and
8 drill your well bores until you find the limit of the
9 contamination.

10 It is just my opinion that there was sufficient wells
11 drilled to establish that fact. And I am a geologist.

12 STEVE NOLAN: I just want to reiterate what
13 Bud said and that is there is always a question about how
14 much sampling is enough. You can continue sampling and
15 continue sampling and continue sampling. The area we are
16 talking about, the size of these areas is such that this
17 number of samples is sufficient.

18 MR. BROCK: Any other questions or comments.
19 If not, this will then conclude the formal part of this
20 meeting. Feel free to stick around and visit. There is a
21 tremendous amount of expertise under this roof, so everyone
22 will be around untill at least 9:00 o'clock.

23 This concludes the formal part of the meeting. I want
24 to again extend my welcome to you to be here in Karnack and
25 we are available to you as a school system and any way we


1 can help, let us know with any other type program.

2
3
4 (Reporter's Note: Formal meeting is concluded.)
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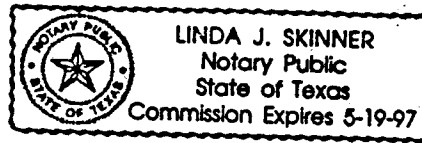
REPORTER'S CERTIFICATE

I, Linda J. Skinner, Official Court Reporter in and for the 71st Judicial District Court of Harrison County, Texas, do hereby certify that this statement of facts contains a true and correct transcription of the proceedings held in the aforementioned cause of action, which occurred in open court and was reported by me on the date indicated.

Signed this the 20th day of July, A.D. 1995.


LINDA J. SKINNER, CSR
Official Court Reporter
200 West Houston, Suite 219
Marshall, Texas 75670

Certificate #1358
Expiration Date: 12/31/95





REPLY TO
ATTENTION OF

015353

July 25, 1995

SMCLO-EN

Mr. Michael Moore
Superfund Investigation Section
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

SUBJECT: Revised Air Monitoring Plan, Appendix C to Draft
Chemical Data Acquisition Plan, Phase III Interim Remedial Action
at Burning Ground 3, Longhorn Army Ammunition Plant in Marshall,
Texas

Dear Mr. Moore:

Enclosed are three copies of the revised Air Monitoring Plan, Appendix C to the Draft Chemical Data Acquisition Plan (CDAP) for the subject project. The plan was revised as per discussions with Mr. John Gott regarding maximum allowable emissions versus estimated emissions for the project. Please insert and replace into the CDAP currently under your review.

If you have any questions, please contact Mr. David Tolbert, at 903-679-2728.

Sincerely,

Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION 015354
Protecting Texas by Reducing and Preventing Pollution

July 25, 1995

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SIOLH-OR
Marshall, TX 75671-1059

CERTIFIED MAIL
P 836 901 075
RETURN RECEIPT REQUESTED

Re: Longhorn Army Ammunition Plant
Interim Remedial Action at Burning Ground No. 3
General Work Plan

Dear Mr. Tolbert:

In accordance with Section VIII. G. 2. of the Federal Facility Agreement, the Texas Natural Resource Conservation Commission (TNRCC) staff request a 20-day extension for reviewing and commenting on the Interim Remedial Action at Burning Ground No. 3 General Work Plan. The original deadline would have been July 27, 1995, but with this request, the date would be August 17, 1995.

If you have any questions or comments, please contact me at (512) 239-2483.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Michael A. Moore".

Michael A. Moore (MC 143)
RI/FS II Unit
Superfund Investigation Section
Pollution Cleanup Division

cc: Jonna Polk, COE Tulsa District (CESWT-PP-EA) ✓
Lisa Price, EPA Region VI (6H-ET)



REPLY TO
ATTENTION OF

July 27, 1995

SMCLO-EN

015355

Ms. Lisa Price
Superfund Enforcement
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

SUBJECT: Final Record of Decision for Early Interim Remedial
Action at Landfill Sites 12 & 16 for Longhorn Army Ammunition
Plant in Marshall, Texas

Dear Ms. Price:

Enclosed are three copies of the Final Record of Decision
(ROD) for Early Interim Remedial Action at Landfill Sites
12 & 16. These copies are provided for Environmental Protection
Agency (EPA) upper management review prior to submission of the
ROD for signature by the Secretary of the Army.

Written comments should be provided by August 10, 1995 so
that changes may be made, and the ROD submitted for signature.
Texas Natural Resource Conservation Commission has been provided
two copies of the ROD, and the letter of concurrence will be
included as Appendix A when received.

After the ROD is signed by the Army, it will be sent for
final approval and signature by EPA.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



DEPARTMENT OF THE ARMY
LONGHORN LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059



REPLY TO
ATTENTION OF

July 27, 1995

SMCLO-EN

015356

Ms. Lisa Price
Superfund Enforcement
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

SUBJECT: Preliminary Design for the Interim Remedial Action at
Landfill Sites 12 & 16 for Longhorn Army Ammunition Plant in
Marshall, Texas

Dear Ms. Price:

Enclosed are two copies of the Preliminary Design for the
Interim Remedial Action at Landfill Sites 12 & 16 for Longhorn
Army Ammunition Plant in Marshall, Texas.

Please review and provide written comments to this office by
August 28, 1995.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

Darrell W. Chinn
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



DEPARTMENT OF THE ARMY
LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1058



REPLY TO
ATTENTION OF

July 27, 1995

SMCLO-EN

015357

Mr. Michael Moore
Superfund Investigation Section
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

SUBJECT: Preliminary Design for the Interim Remedial Action at
Landfill Sites 12 & 16 for Longhorn Army Ammunition Plant in
Marshall, Texas

Dear Mr. Moore:

Enclosed are two copies of the Preliminary Design for the
Interim Remedial Action at Landfill Sites 12 & 16 for Longhorn
Army Ammunition Plant in Marshall, Texas.

Please review and provide written comments to this office by
August 28, 1995.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

for Darrell W. Chinn
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



DEPARTMENT OF THE ARMY
LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059



REPLY TO
ATTENTION OF

July 27, 1995

SMCLO-EN

015358

Mr. H.L. Jones
Texas Natural Resource Conservation Commission
2916 Teague Drive
Tyler, Texas 75701

SUBJECT: Preliminary Design for the Interim Remedial Action at
Landfill Sites 12 & 16 for Longhorn Army Ammunition Plant in
Marshall, Texas

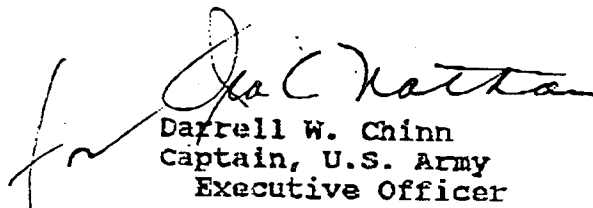
Dear Mr. Jones:

Enclosed is one copy of the Preliminary Design for the
Interim Remedial Action at Landfill Sites 12 & 16 for Longhorn
Army Ammunition Plant in Marshall, Texas.

Please review and provide written comments to this office by
August 28, 1995.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,


Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



DEPARTMENT OF THE ARMY
U.S. ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE (PROVISIONAL)
ABERDEEN PROVING GROUND, MARYLAND 21010-5422

REPLY TO
ATTENTION OF



015359

MCHB-DE-HR (40)

28 JUL 1995

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, Tulsa
District, ATTN: CESWT-PP-EA/Ms. Jonna Polk,
Post Office Box 61, Tulsa, Oklahoma 74121-0061

SUBJECT: Review of the Draft Work Plan for Phase III of the
Interim Remedial Action Burning Ground No. 3 and UEP, LHAAP 18
and 24, Volumes 1-5, Longhorn Army Ammunition Plant, Marshall,
Texas, Prepared by Dow Environmental, 23 June 1995

1. The U.S. Army Center for Health Promotion and Preventive
Medicine (Provisional) (USACHPPM(PROV)) has reviewed the subject
document on behalf of the Office of The Surgeon General. The
description of the proposed work plan adequately addresses public
health concerns. Therefore, no comments are included.

2. The scientist reviewing the document and our point of contact
is Mr. Mark A. Dossey, Health Risk Assessment and Risk
Communication Program, DSN 584-2953 or commercial (410) 671-2953.

FOR THE COMMANDER:

Arthur P. Lee

ARTHUR P. LEE, P.E.

MAJ, MS

Program Manager, Health Risk
Assessment and Risk Communication

CF:

HQDA (SGPS-PSP-E)

CDR, USAMEDCOM, ATTN: MCHO-CL-P

CDR, CEMRD, ATTN: CEMRD-ET-EH

CDR, USAEC, ATTN: SFIM-AEC-IRP

CDR, LHAAP, ATTN: SMCLO-EN

Readiness thru Health

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 31, 1995

015360

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SIOLH-OR
Marshall, Texas 75671-1059

CERTIFIED MAIL
P 836 901 076
RETURN RECEIPT REQUESTED

Re: Longhorn Army Ammunition Plant
Interim Remedial Action at Burning Ground No. 3
Comments on the General Work Plan, Section 3: Soil and Source
Material Excavation, Treatment and Disposal Plan

Dear Mr. Tolbert:

The Texas Natural Resource Conservation Commission (TNRCC) staff have completed its review of the Soil and Source Material Excavation, Treatment and Disposal Plan for the Interim Remedial Action at Burning Ground No. 3, dated June 27, 1995. Specific comments from Alvie Nichols of the TNRCC Superfund Engineering Section are enclosed. As stated in our letter dated July 25, 1995, we intend to submit our comments on the rest of the work plan to you by August 17, 1995.

Our February 2, 1994 comments on the original design proposal for this unit identified 40 CFR Part 264 Subpart L (as referenced by 30 TAC §335.152) as state ARAR's. It appears that these ARAR's have been considered, and the design was modified accordingly. We recommend that the Army pay particular attention to the following aspects of the final design and operation of this unit to assure compliance with these ARAR's:

- All materials which will come into contact with the waste, and are intended to prevent releases of the waste into the environment (e.g., liners and components of the leachate collection and removal system), must be compatible with the waste in accordance with 40 CFR §§264.251(a)(1)(i) and 264.251(a)(2)(i)(A).
- Systems to control and/or manage storm water run-on and run-off and particulate wind dispersal must be installed, operated, and maintained in such a way so as to comply with 40 CFR §§264.251(c)-(f). Materials and equipment used in these systems (e.g., pumps, liner materials, tanks or containers, etc.) must be of adequate design and construction and be operated and maintained in such a manner

Mr. David Tolbert
Page 2
July 31, 1995

015361

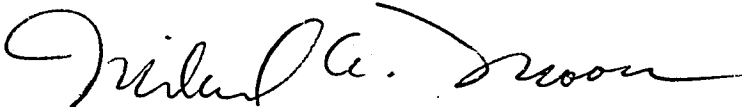
so as to comply with 40 CFR §§264.251(c)-(f). Materials and equipment used in these systems (e.g., pumps, liner materials, tanks or containers, etc.) must be of adequate design and construction and be operated and maintained in such a manner that they will function properly throughout the operational life of the unit.

- Monitoring and inspection activities specified in 40 CFR §264.254 must be followed during construction and operation of the unit. It is recommended that specific plans and checklists be developed and provided to the personnel who will be responsible for performing these activities, and that accountability logs be maintained at the site to ensure that these activities are properly performed, and that any discrepancies noted are documented and corrected.

If the specific comments in the enclosure to this letter are adequately addressed (including submittal of drawings which are not marked "Confidential" or "Proprietary", unless the Army provides justification under the Texas Open Records Act for such markings; and which do bear the signature and seal of a Professional Engineer who is registered in Texas); and the Army complies with the state ARAR's identified in this letter, the TNRCC will concur with the Army's plans to begin construction of the Soil Handling/Dewatering Pad.

If you have any additional questions or comments, please contact me at (512) 239-2483.

Sincerely yours,



Michael A. Moore (MC 143)
RI/FS II Unit
Superfund Investigation Section
Pollution Cleanup Division

Enclosure

cc: Jonna Polk, COE Tulsa District (CESWT-PP-EA) ✓
Lisa Price, EPA Region VI (6SF-AT)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

015362

AUG 1 1995

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SMÇLO-EN
Marshall, Texas 75671-1059

Re: Interim Remedial Action at Burning Ground No. 3
Design Work Plan
Longhorn Army Ammunition Plant

Dear David:

In accordance with the Federal Facility Agreement for the Longhorn Army Ammunition Plant, EPA is requesting an extension to complete the review of the Interim Remedial Action at Burning Ground No. 3 design work plans. EPA will submit comments on or by August 17, 1995.

If you have any questions about this or any other matter, please contact me at (214) 665-6744.

Sincerely,

Lisa Marie Price
Remedial Project Manager
Superfund Division

cc: Captain Darrell W. Chinn
Executive Officer, U.S. Army
Longhorn Army Ammunition Plant
Marshall, Texas 75671-1059

✓ Tulsa District Corps of Engineers
P.O. Box 61
Attn: Ms. Jonna Polk
CESWT-PP-E
Tulsa, OK 74121-0061

Mike Moore, Superfund
Texas Natural Resource Conservation Commission
P.O. Box 13087
Section MC143
Austin, TX 78711-3087



REPLY TO
ATTENTION OF

LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059

0000042719186697235

P.02



August 1, 1995

SMCLO-EN

Mr. Michael Moore
Superfund Investigation Section
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

015863

SUBJECT: Preliminary Design for the Interim Remedial Action at
Landfill Sites 12 & 16 for Longhorn Army Ammunition Plant in
Marshall, Texas

Dear Mr. Moore:

In reference to our letter dated July 27, 1995, we are
providing two additional copies of the subject document. Per
your request, four copies of future submittals will be provided
to your office.

Please review and provide written comments to this office by
August 28, 1995.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

[Signature]
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

015364

AUG 1 1995

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SMÇLO-EN
Marshall, Texas 75671-1059

Re: Interim Remedial Action at Burning Ground No. 3
Design Work Plan
Longhorn Army Ammunition Plant

Dear David:

In accordance with the Federal Facility Agreement for the Longhorn Army Ammunition Plant, EPA is requesting an extension to complete the review of the Interim Remedial Action at Burning Ground No. 3 design work plans. EPA will submit comments on or by August 17, 1995.

If you have any questions about this or any other matter, please contact me at (214) 665-6744.

Sincerely,

Lisa Marie Price
Remedial Project Manager
Superfund Division

cc: Captain Darrell W. Chinn
Executive Officer, U.S. Army
Longhorn Army Ammunition Plant
Marshall, Texas 75671-1059

✓ Tulsa District Corps of Engineers
P.O. Box 61
Attn: Ms. Jonna Polk
CESWT-PP-E
Tulsa, OK 74121-0061

Mike Moore, Superfund
Texas Natural Resource Conservation Commission
P.O. Box 13087
Section MC143
Austin, TX 78711-3087

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 1, 1995

015365

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SIOLH-OR
Marshall, Texas 75671-1059

CERTIFIED MAIL
P 836 901 706
RETURN RECEIPT REQUESTED

Re: Longhorn Army Ammunition Plant
Final Hydrogeologic Assessment Report

Dear Mr. Tolbert:

The Texas Natural Resource Conservation Commission (TNRCC) staff have completed its review of the "Final Hydrogeologic Assessment Report", dated May 1995, which was received on June 16, 1995. We concur with the U. S. Army that the document provides a general regional setting and reference for the reviewing of more site specific hydrogeological assessments.

We also concur with and emphasize the Army's intentions in preparing such a document as a resource, one that is a dynamic reference or a "living document," in which past historic technical data can be organized and future technical data can be added. We agree that this needs to be emphasized since there was limited geologic and hydrogeologic information available, as stated in report. We believe that the report was well written and that the data were adequately assessed. If you have any questions or comments, please contact me at (512) 239-2483.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Michael A. Moore".

Michael A. Moore (MC-143)
RI/FS II Unit
Superfund Investigation Section
Pollution Cleanup Division

cc: Jonna Polk, COE Tulsa District (CESWT-PP-EA) ✓
Lisa Price, EPA Region 6 (6SF-AT)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

AUG 1 1995

015366

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SMCLO-EN
Marshall, Texas 75671-1059

Re: Change in address
Longhorn Army Ammunition Plant


Dear David:

Due to EPA Region 6's recent organization, my mail code has changed. All correspondence should be sent to the following address:

Lisa Marie Price
Remedial Project Manager
Superfund Division (6SF-AT)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

If you have any questions about this or any other matter, please contact me at (214) 665-6744.

Sincerely,


Lisa Marie Price
Remedial Project Manager
Superfund Division

cc: Captain Darrell W. Chinn
Executive Officer, U.S. Army
Longhorn Army Ammunition Plant
Marshall, Texas 75671-1059

Tulsa District Corps of Engineers
P.O. Box 61
Attn: Ms. Jonna Polk
CESWT-PP-E
Tulsa, OK 74121-0061

Mike Moore, Superfund
Texas Natural Resource Conservation Commission
P.O. Box 13087
Section MC143
Austin, TX 78711-3087



DEPARTMENT OF THE ARMY
LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059



REPLY TO
ATTENTION OF

SIOLH-OR

2 August 1995 015367

MEMORANDUM THRU

Commander, U.S. Army Industrial Operations Command, ATTN: AMSIO-EQE
(Mr. Robert Radkiewicz), Rock Island, IL 61299-6000

Commander, U.S. Army Materiel Command, 5001 Eisenhower Avenue,
ATTN: AMCEN (COL M. Potter), Alexandria, VA 22333-0001

FOR Assistant Chief of Staff, Installation Management, ATTN: DAIM-ED-R
(Mr. M. Vogt), 600 Army Pentagon, Washington, D.C. 20310-0600

Subject: Early Interim Action Record of Decision (ROD) for Sites 12 and 16,
(Landfills), Longhorn Army Ammunition Plant

1. Enclosed is subject document for your review and execution. The document incorporates review comments from the Army Environmental Center and the Center for Health Promotion and Preventive Medicine. The ROD was developed with the active participation and concurrence of the U.S. Environmental Protection Agency Remedial Project Manager.
2. The ROD has also been supplied to the Texas Natural Resource Conservation Commission with a request for a letter of concurrence to support signature of the ROD.
3. ROD finalization for this action is projected for 25 August 1995.
4. Upon execution, the document should be transmitted to: Ms. Jane N. Saginaw, Regional Administration, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733.
5. Questions may be referred to the undersigned at Comm (903) 679-2200 or DSN 566-2200 or Mr. David Tolbert, Comm (903) 679-2728 or DSN 566-2728.

FOR THE COMMANDER:

Encl
as

DARRELL W. CHINN
CPT, OD
Executive Officer



LONGHORN LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL, TEXAS 75671-1059



REPLY TO
ATTENTION OF

August 9, 1995

SMCLO-EN

015368

Ms. Lisa Price
Superfund Enforcement
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

SUBJECT: Draft Final Phase II Sumps Investigation Sample and Data
Report Volume 1 - 5 for Longhorn Army Ammunition Plant in
Marshall, Texas

Dear Ms. Price:

Enclosed is one copy of the Draft Final Phase II Sumps
Investigation Sample and Data Report Volume 1 - 5 for Longhorn
Army Ammunition Plant in Marshall, Texas.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

fn *W. Chinn*
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



DEPARTMENT OF THE ARMY
LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL TEXAS 75671-1059

10 3630342719186697235

P.02



REPLY TO
ATTENTION OF

August 9, 1995

015369

SMCLO-EN

Mr. Michael Moore
Superfund Investigation Section
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

SUBJECT: Draft Final Phase II Sumps Investigation Sample and Data
Report Volume 1 - 5 for Longhorn Army Ammunition Plant in
Marshall, Texas

Dear Mr. Moore:

Enclosed is one copy of the Draft Final Phase II Sumps
Investigation Sample and Data Report Volume 1 - 5 for Longhorn
Army Ammunition Plant in Marshall, Texas.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

fn
G. C. Kathan
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



ONLY TO
ATTENTION OF

MARSHALL, TEXAS 75671-1059



August 9, 1995

SMCLO-EN

Ms. Lisa Price
Superfund Enforcement
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

-015370

SUBJECT: Group 2 and Group 4 Baseline Risk Assessment Work Plans,
Minutes for the July 19, 1995 risk Assessment Concept Scoping
Meeting for Longhorn Army Ammunition Plant in Marshall, Texas

Dear Ms Price:

Enclosed are two copies of the subject minutes.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



LONGHORN LOUISIANA ARMY AMMUNITION PLANT
MARSHALL, TEXAS 75671-1053



REPLY TO
ATTENTION OF

August 9, 1995

SMCLO-EN

015371

Mr. Michael Moore
Superfund Investigation Section
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

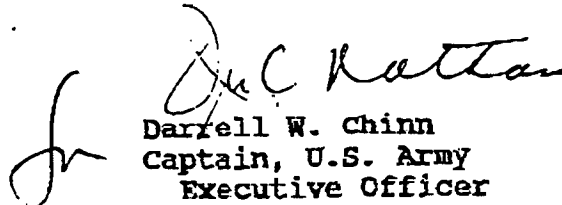
SUBJECT: Group 2 and Group 4 Baseline Risk Assessment Work Plans,
Minutes for the July 19, 1995 risk Assessment Concept Scoping
Meeting for Longhorn Army Ammunition Plant in Marshall, Texas

Dear Mr. Moore:

Enclosed are four copies of the subject minutes.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,


Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosures



LONGHORN/LOUISIANA ARMY AMMUNITION PLANTS
MARSHALL TEXAS 75671-1059



REPLY TO
ATTENTION OF

August 9, 1995

SMCLO-EN

Mr. H.L. Jones
Texas Natural Resource Conservation Commission
2916 Teague Drive
Tyler, Texas 75701

015372

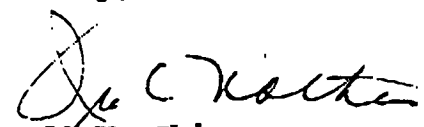
SUBJECT: Group 2 and Group 4 Baseline Risk Assessment Work Plans,
Minutes for the July 19, 1995 risk Assessment Concept Scoping
Meeting for Longhorn Army Ammunition Plant in Marshall, Texas

Dear Mr. Jones:

Enclosed is one copy of the subject minutes.

If you have any questions, please contact Mr. David Tolbert,
at 903-679-2728.

Sincerely,

fn 
Darrell W. Chinn
Captain, U.S. Army
Executive Officer

Enclosure

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

015373

August 10, 1995

David Tolbert, Project Manager
Longhorn Army Ammunition Plant
Attn: SIOLH-OR
Marshall, Texas 75671-1059

CERTIFIED MAIL
P 836 901 707
RETURN RECEIPT REQUESTED

Re: Longhorn Army Ammunition Plant
Interim Remedial Action at Burning Ground No. 3
Comments on the General Work Plan, Section 3: Soil and Source
Material Excavation, Treatment and Disposal Plan (or "Work Plan")

Dear Mr. Tolbert:

The Texas Natural Resource Conservation Commission (TNRCC) staff has completed its review of the revised drawings for the Soil Handling/Dewatering Pad (SHDP) for the referenced site, which we received on August 2, 1995, in response to our first set of comments, dated July 31, 1995. The following design comments have been provided by Alvie Nichols of the Superfund Engineering Section:

- Since drawings show the base of SHDP will be constructed of sand covered by compacted clay, we are concerned with the compliance with 30 TAC Section 335.170. Specifically, we are concerned with whether this configuration will adequately prevent clogging of the Leachate Collection System and provide protection of the primary HDPE layer.
- TNRCC will consider any leachate that is collected in the secondary Leachate Collection System to be evidence of a failure of the primary HDPE layer and require repairs.
- TNRCC interprets drawings to show that slopes to the sump will be based on elevations at four outside points (elevations of 205.5 ft each) and sump (elevation of 204.95 ft), rather than the slope percentages indicated on the drawings.
- Elevations at Monitoring/Extraction Pipes do not match scale shown.

Mr. David Tolbert
Page 2
August 10, 1995

015374

Additionally, the Work Plan does not demonstrate how the Army will comply with the State's ARAR's for Waste Piles, specifically, 30 TAC Chapter 335, Subchapter F. The relevant sections of that we feel the Army needs to pay close attention to are §335.151 - 153, §335.156 - 159, §335.162 - 166, §335.170, and §335.177.

If you have any additional questions or comments, please contact me at (512) 239-2483.

Sincerely yours,



Michael A. Moore (MC 143)
RI/FS II Unit
Superfund Investigation Section
Pollution Cleanup Division

Enclosure

cc: Jonna Polk, COE Tulsa District (CESWT-PP-EA) ✓
Lisa Price, EPA Region VI (6SF-AT)

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

015375

August 14, 1995

Mr. Myron O. Knudson, P.E., Director
Superfund Division
U. S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

RE: Longhorn Army Ammunition Plant
Record of Decision

Dear Mr. Knudson:

We have reviewed the proposed Record of Decision (ROD) for the Early Interim Remedial Action, Landfill Sites 12 and 16, Longhorn Army Ammunition Plant. We concur that the remedy described in the August 1995 ROD is the most appropriate for these sites. The selected remedy consists of a multi-layer cap section which includes: a foundation soil layer; a sodium bentonite geocomposite liner; a geosynthetic membrane liner; a final soil cover; and perimeter berms and drainage swales.

We have provided information regarding the State's requirements for wastewater discharge, and closure and post closure care of landfills, which have been incorporated into the ROD. We anticipate that adequate funding and personnel resources will be provided through the Department of Defense/State Memorandum of Agreement and the Federal Facility Agreement to allow our continued participation in the remedial action.

Sincerely,

William R. Campbell
Dan Pearson
Executive Director

DP/MM/mm

cc: David Tolbert, LHAAP (SIOLH-OR)
; Jonna Polk, COE Tulsa District (CESWT-PP-EA) ✓
Lisa Price, EPA Region 6 (6SF-AT)