**Notice of Availability of Final Records of Decision**
**for Four Environmental Sites**
**Longhorn Army Ammunition Plant, Karnack, Texas**

The United States Army announces three Record of Decision (ROD) documents for environmental sites at Longhorn Army Ammunition Plant. The RODs, which document the selected remedies for the sites, have been signed by the U.S. Army and the U.S. Environmental Protection Agency and have the concurrence of the Texas Commission on Environmental Quality as follows:

***RODs signed September 13, 2016***

- **LHAAP-16**, Landfill; Selected Remedy: Maintenance of the existing landfill cap, In Situ Bioremediation, Biobarriers, Monitored Natural Attenuation (MNA) and Land Use Controls (LUCs);
- **LHAAP-17**, Burning Ground No. 2/Flashing Area, Group 2; Selected Remedy: Contaminated soil removal, Extraction and treatment of groundwater, MNA and LUCs;
- **LHAAP-001-R**, South Test Area/Bomb Test Area and **LHAAP-003-R**, Ground Signal Test Area; Selected Remedy: LUCs and Limited groundwater monitoring

Copies of the signed RODs are available for public review at the Marshall Public Library, 300 S. Alamo, Marshall, Texas, 75670, 10:00 A.M. to 8:00 P.M. Monday through Thursday, 10:00 A.M. to 5:30 P.M. Friday and Saturday.

For information regarding these sites, contact Dr. Rose M. Zeiler, Longhorn Army Ammunition Plant, P.O. Box 220, Ratcliff, Arkansas, 72951; phone number 479-635-0110; e-mail rose.m.zeiler.civ@mail.mil.

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Responsiveness Summaries from the Final RODs for LHAAP-16, LHAAP-17, and LHAAP-001-R-01 and -003-R-01 are provided here. The Responsiveness Summary provides the U.S. Army, EPA, and TCEQ with information about community concerns regarding the preferred remedial alternative for the site, as it was presented for public review and comment in the Proposed Plan. It also provides a formal record of the public's comments that were considered in the decision to select the preferred alternative, and the mechanism for the U.S. Army to respond to public comments.

**LHAAP-16**

# 3.0 Responsiveness Summary

The Responsiveness Summary serves three purposes. First, it provides the U. S. Army, USEPA, and TCEQ with information about community concerns with the preferred alternative at LHAAP-16 as presented in the Proposed Plan. Second, it shows how the public's comments were considered in the decision-making process for selection of the remedy. Third, it provides a formal mechanism for the U.S. Army to respond to public comments.

The U.S. Army, USEPA, and TCEQ provide information regarding LHAAP-16 through public meetings, the Administrative Record for the facility, and announcements published in the Shreveport Times and Marshall News Messenger newspapers. **Section 2.3** discusses community participation on LHAAP-16, including the dates for the public comment period, the date, location, and time of the public meetings, and the location of the Administrative Record. The following documents related to community involvement were added to the Administrative Record:

- Transcript of the public meeting on October 19, 2010
- Presentation slides from the October 19, 2010 public meeting
- Written questions and comments from the public during the public comment period, and the U.S. Army response to those comments dated March 14, 2011.

## 3.1 Stakeholder Issues and Lead Agency Responses

This section responds to significant issues raised by stakeholders including the public and community groups that were received in written or verbal form.

**Question/comment**: The Army states that it could take 280 years to reduce groundwater contaminant concentrations to acceptable levels. It is not reasonable to propose plans that could require water quality monitoring, maintenance of the landfill cap, maintenance of the biobarriers, and maintenance of LUCs for such a length of time.

The Army should take steps to reduce the length of time that will be required to achieve acceptable contaminant concentrations. These steps could include: installation of an effective pump and treat system, modification of the proposed in-situ bioremediation system to cover a greater portion of the site and to operate until acceptable concentrations are achieved, thermal treatment (e.g., steam stripping), and elimination or reduction of the contaminant source by removing the landfill or reducing the mass of contaminants that it contains.

**Response**: Given the nature of the residual contaminants that are present at LHAAP-16, the length of time that will be required to achieve cleanup levels would be long for any of the remedial alternatives, whether treatment, migration control, or source control by removal.

It is believed that TCE was present within the landfill as DNAPL has dissolved into the groundwater at very high concentrations and migrated to the east (down-gradient of the landfill). This high concentration region acts as a secondary source of groundwater contamination. Although TCE may remain in the landfill, the landfill cover system has significantly reduced the driving force of recharge and added a degree of isolation to the remaining waste. Removal of the landfill would not affect the secondary source of groundwater contamination outside the landfill and would be a very large cost without corresponding benefit.

The LUCs restricting the use of groundwater will be highly effective as will be long term maintenance of the LUCs, given that the reasonably anticipated future use of the site is as a national wildlife refuge (i.e., Caddo Lake National Wildlife Refuge) and the owner a federal agency. Once the property is transferred into the refuge system, the property must be kept as a National Wildlife Refuge unless there is an act of Congress which removes the parcel or the land is exchanged in accordance with the National Wildlife Refuge System Administration Act of 1966 and the National Wildlife Refuge System Act Amendments of 1974. A national wildlife refuge by its very nature includes physical access and use restrictions, and is subject to control and continual inspection by Refuge personnel. The LUCs will restrict access to the groundwater for purposes other than environmental testing until cleanup levels are met. Additionally, access of groundwater through well installations requires a permit from the Texas Department of Licensing and Regulation or Texas Water District authority. The department will be provided a copy of the county recordation that indicates the location of contaminated groundwater at the site and associated restriction.

Since LHAAP-16 is enclosed within a national wildlife refuge with no current or planned use of groundwater for human consumption, plume stability and protection of Harrison Bayou are key measures for evaluation of a remedial strategy. A detailed analysis of alternatives, including those with aggressive treatments, was conducted according to the evaluation criteria identified in the NCP (40CFR 300.430). Advantages, disadvantages, and trade-offs were considered as part of the evaluation process during the feasibility study (Jacobs, 2002). The suggested alternatives were considered in the FS and were not seen as sufficiently advantageous over the preferred alternative (Shaw, 2010).

**Question/Comment:** Groundwater contamination at LHAAP-16 is caused by contaminants being leached from wastes in the landfill. The landfill could continue to generate large amounts of contaminants for decades or centuries. The Army's preferred alternative does not attempt to reduce the length of time that the landfill will generate contaminants.

The Army should attempt to reduce the length of time the landfill will generate large amounts of contaminants. This could be done by 1) removing the landfill or 2) treating the landfill to reduce the mass of contaminants it contains (e.g., hot-spot removal, flushing with surfactants or solvents, bioremediation, vapor extraction).

**Response:** It is believed that TCE was present within the landfill as DNAPL has dissolved into the groundwater at very high concentrations and migrated to the east (down-gradient of the landfill). This high concentration region acts as a secondary source of groundwater contamination. Although TCE may remain in the landfill, the landfill cover system has significantly reduced the driving force of recharge and added a degree of isolation to the remaining waste. The biobarrier will be installed at the edge of the landfill to treat/remediate and thereby control potential migration of contaminants from the landfill. Removal of the landfill would not affect the secondary source of groundwater contamination outside the landfill and would be a very large cost without corresponding benefit. Since LHAAP-16 is enclosed within a national wildlife refuge with no current or planned use of groundwater for human consumption, plume stability and protection of Harrison Bayou are more important measures for evaluation of remedial alternatives than the time factor.

In 1998 a landfill system was placed over the site and was completed as part of an early Interim Remedial Action (IRA) in accordance with the USEPA presumptive remedy guidance under CERCLA for municipal landfills (EPA 540-F-93-035) and for military landfills (EPA 540-F-96-020). Capping as opposed to waste treatment or removal, is a presumptive remedy at landfills as it has been shown to be more appropriate in comparison to other remedies. The IRA was intended to be consistent with the final remedy and is considered a component of the final remedy being proposed for LHAAP-16.

Landfill removal and landfill source treatment alternatives were included in the comparative analysis of alternatives performed during the feasibility study (Jacobs, 2002) and during the generation of the proposed plan (Shaw 2010) for LHAAP-16. These remedial alternatives did not demonstrate increases in effectiveness that were balanced by their increased costs and short-term impacts.

**Question/Comment:** The Army's 280 year estimate of cleanup time due to natural attenuation is not based on solid evidence. It appears that the Army chose this number because it was the cleanup time calculated for natural attenuation of TCE at well 16WW16. However, a longer TCE cleanup time (492 years) was calculated for well 16WW12. In addition, contaminant concentrations in some wells are stable or increasing rather than decreasing (e.g., perchlorate in well 16WW12, and TCE in well 16WW36). The calculated cleanup time due to natural attenuation for these wells would be infinity.

The Army does not address the question of whether the remedial actions it has conducted at the site have affected the cleanup time calculations. That is, are the contaminant reductions seen at the site due to natural attenuation, the remedial actions, or both?

**Response:** The duration of 280 years was considered as a reasonable estimate based on the prior history of TCE concentrations at 16WW16. The wells with stable or increasing concentrations are in areas where treatment will be applied, or where biobarriers will cut off renewal of contaminants from upgradient areas. Implementing the remedy is expected to expedite attenuation rates, making them faster, so the worst case scenario at 16WW12 was not chosen as a representative case. Instead the second slowest measurable attenuation was used as an initial estimate for duration.

Contaminant reductions thus far are due to a combination of past actions and natural attenuation. Past actions have removed contaminant mass in some areas of the site and can thus be assumed to have reduced cleanup time in those specific areas, though there is insufficient historical data to quantify the extent of that reduction. The areas most affected in this way would be the capture zone of the extraction wells and a small area immediately down-gradient of the semi-passive biobarrier. The cleanup times at locations that are outside the immediate down-gradient vicinity of the semi-passive biobarrier and far from the extraction wells can be assumed to be outside any significant influence from either of those past actions. Most of the wells at the site (e.g., 16WW16, 16WW12, 16WW43, etc.) are outside those influences.

**Question/Comment:** The Army intends to evaluate the effectiveness of natural attenuation in a 28 month period following the installation of the biobarriers and the in-situ bioremediation system, and after groundwater extraction has been discontinued. This does not appear to make sense. The effects of the remedial actions will persist for some unknown period of time. How will the Army distinguish between the effects of the remedial actions, and the effects of natural attenuation?

**Response:** The application of biobarriers and bioremediation will be in discrete areas. The effectiveness of remedial actions will be evaluated for wells in those areas. MNA will be evaluated for wells that are outside the remedial action areas.

**Question/Comment:** The Army should clearly explain how it will determine whether natural attenuation is reducing contaminants concentrations at an acceptable rate.

**Response:** The Army intends to present details of the MNA remedy implementation in a remedial design for LHAAP-16. The regulatory guidance established by USEPA (1998) for MNA will be followed to demonstrate that natural attenuation is occurring.

**Question/Comment:** The passive biobarriers will intercept groundwater only in the shallow zone. However, the intermediate zone also contains high concentrations of contaminants. The Army should explain why it chose not to extend the passive barriers into the intermediate zone.

**Response:** Biobarriers were not extended into the intermediate zone because the intermediate zone does not intersect surface water in Harrison Bayou. The intermediate zone is deeper than the flowline elevation of the bayou. The highest recent COC concentrations in the intermediate zone are more than 10 times lower than recent COC concentrations in the shallow zone. Nonetheless, the intermediate zone will be addressed via bioremediation injections in the most contaminated locations that have been detected within that zone. MNA will be implemented for areas outside the influence of the active remedies. Monitoring will verify protection of human health and the environment by documenting that further reductive dechlorination is occurring within the plume, that the plume is not migrating, and that contaminant concentrations are being reduced to cleanup levels.

**Question/Comment:** The pumping of the extraction wells may be limiting the lateral expansion of the contaminant plume. After the extraction wells are shut down, the plume may expand such that it will flow around the ends of the down gradient biobarrier. The Army should consider this possibility in its final remedial design.

**Response:** There are no plans to remove the extraction system, just to turn it off. The extraction wells will be shut down after application of in situ bioremediation. In situ bioremediation is expected to greatly reduce contaminant concentrations in the application area, minimizing the migration of contaminants toward the biobarrier that will be installed near the bayou. The biobarrier at the landfill is expected to treat contaminated groundwater thereby controlling renewal of the plume at the landfill boundary. The biobarrier is a treatment remedy for contaminated groundwater and not a physical barrier to preventing flow of groundwater. The remnants of the plume are expected to attenuate over time, and groundwater monitoring will continue to check for future potential migration.

**Question/Comment:** Groundwater up-gradient of Harrison Bayou is highly contaminated, and the contaminant plume emanating from the landfill is discharging to Harrison Bayou. However, there is no reason to believe that Harrison Bayou acts as a complete barrier to groundwater flow. A portion of the contaminant plume may extend beyond the bayou. The Army should install monitor wells to the east of Harrison Bayou to determine the full extent of groundwater contamination.

**Response:** Since 1999, the Army has collected quarterly surface water samples from three locations in Harrison Bayou. During August 2003 and August 2007, perchlorate was detected in the surface water samples collected from one sampling location in Harrison Bayou (HBW-1) indicating there is some discharge by seepage into Harrison Bayou. Except for the 2 quarters, perchlorate was not detected in any other samples during any other sampling events.

Many wells exist on the east side of Harrison Bayou. The pair of wells closest to the east is 18WW10 (shallow) and 18WW11 (intermediate), which show no COC contamination.

**Question/Comment:** The proposed monitor well network will not detect contaminants that flow to the southeast of the down gradient barrier. The Army should install at least one shallow and one intermediate monitor well between the southeast end of the barrier and Harrison Bayou.

The proposed monitor well network does not include an intermediate monitor well between the down gradient barrier and Harrison Bayou. The Army should install an intermediate monitor well next to well 16WW40.

The proposed monitor well network will not detect contaminants that flow thorough the northern portion of the down gradient barrier. The Army should install at least one shallow and one intermediate monitor well between the northern portion of the barrier and Harrison Bayou.

The extent of the contaminant plume in the shallow aquifer north of well 16WW22, and in the intermediate aquifer north of well 16WW41, is unknown. The Army should install at least one shallow well and one intermediate monitor well to the north of these wells.

**Response:** The need for installation of additional monitoring wells will be evaluated during the remedial design.

**Question/Comment:** The Army Corps of Engineers determined that the eastern portion of the site is within the floodplain of Harrison Bayou. It is not clear, however, whether any portion of the landfill itself is in the floodplain. The Army should determine whether any portion of the landfill is within the floodplain. If it is, steps should be taken to protect the landfill from the effects of flooding.

**Response:** The southeastern edge of the landfill is within the floodplain (U.S. Department of Housing and Urban Development, Flood Hazard Boundary Map, Harrison County, Texas, Unincorporated Area, Community Panel Number 480847 0004 A, Effective date: September 6, 1977, Converted by Letter Effective 11/1/89). This was known at the time the record of decision was signed for design and construction of the landfill. The southeastern portion of the landfill was designed with a compacted soil berm to protect the cap from flood waters. Additionally, the landfill cap is inspected periodically and maintenance is performed as necessary. The design and the follow-up inspection/maintenance activities are expected to be sufficient to protect the landfill from the effects of flooding.

**Question/Comment:** The Army is proposing only one sampling point on Harrison Bayou near site 16. Thus, if contaminants are detected, the Army will not be able to determine whether they are coming from site 16 or from an upstream source. In addition, this single sampling point will

not detect any site 16 contaminants that enter Harrison Bayou downstream of the point. That is, it will not detect contaminants that may flow around the northern end of the biobarrier, or through the barrier if it fails to function as intended.

**Response:** Based on groundwater flow and the proximity of Harrison Bayou, sampling location HBW-1 is considered the location most likely to reveal contamination resulting from LHAAP-16. Continued sampling of HBW-1 or a nearby location will be required by the ROD for LHAAP-16. In accordance with a 1999 agreement between Army, TCEQ, and EPA, the Army currently collects quarterly surface water samples from HBW-1 plus two other locations in Harrison Bayou - HBW-10, which is upstream, and HBW-7, which is downstream. While the Army, TCEQ, and EPA might agree to alter the locations of HBW-7 and HBW-10 at some later date, perchlorate results over the last 10 years have indicated that HBW-1 is the location of greatest concern.

In addition, the selected remedy also includes a network of monitoring wells down gradient of the biobarrier in addition to the surface water sampling. Therefore, concentrations of groundwater that has the potential to enter into Harrison Bayou would be known.

**Question/Comment:** Although Harrison Bayou was not flowing on October 19, 2010, there was a pool of standing water in the streambed. This pool was about 30 feet upstream of well 16WW40, and in the same area as the seep that was sampled in 1995. The pool was approximately 20 feet long, three feet wide, and a few inches deep. This pooled water may be groundwater that has discharged to the streambed. During periods when Harrison Bayou was not flowing, the Army should monitor the streambed for pools of water. If they are present, they should be sampled. The Army should also monitor the banks of Harrison Bayou for seeps and should attempt to sample any that are discovered.

**Response:** Previous sampling of the standing water in Harrison Bayou indicated that in the past contaminated groundwater discharged by seepage into Harrison Bayou. Because the basis for sampling is protection of human health by protecting the surface water that flows through Harrison Bayou to Caddo Lake, continued sampling of standing water in pools will serve no purpose. Periodic sampling of surface water is already conducted on a quarterly basis at three locations in Harrison Bayou. The banks of Harrison Bayou will be inspected for locations of possible seeps.

**Question/Comment:** The Army performed a 'streamlined' Human Health Risk Assessment for Harrison Bayou at site 16. This risk assessment found that the excess lifetime cancer risk for dermal contact with Harrison Bayou surface water was $1.62 \times 10^{-5}$. This is higher than the lower bound ($1.0 \times 10^{-6}$) of the EPA target risk range. The streamlined assessment did not estimate the human health risk from drinking the water, nor did it estimate the effects that the water could have on Caddo Lake. The Army stated that a full risk assessment of Harrison Bayou would be conducted as part of the Group 2 risk assessment. However, site 16 does not appear to have been included in

the Group 2 risk assessment. The Army should perform a full Human Health Risk Assessment for Harrison Bayou at site 16.

**Response:** The calculated risk from surface water ($1.62x10^{-5}$) was within the range of acceptable risk levels for excess lifetime cancer risk ($1x10^{-4}$ to $1x10^{-6}$). The Group 2 Risk Assessment included a risk assessment for Harrison Bayou and sampling location HBW-1, which is associated with LHAAP-16 was included as part of that assessment. Additionally the risk assessment report states "because the depth of this surface water body ranges from a few inches to a few feet, it is unlikely that it would be used to any significant extent for swimming; therefore, the incidental ingestion of surface water is not evaluated".

**Question/Comment:** Concentrations of antimony and thallium that exceed the EPA MCL are commonly detected in groundwater at site 16. However, the Army has not included antimony or thallium as contaminants of concern (COC). The Army should either include antimony and thallium as a COCs for groundwater at site 16, or explain why they are omitted.

**Response:** Antimony and thallium are commonly found in groundwater and were detected in groundwater at LHAAP-16. However, they were not found to be significant contributors to cancer risk or non-cancer hazard in groundwater at LHAAP-16 during the human health risk assessment conducted for the site (Jacobs, 2001). The detections of antimony and thallium were erratic and did not appear to represent a plume of contamination. Additionally, they were not detected above background levels in soil at the landfill. These factors indicated that their occurrence was unlikely to be associated with contamination from the landfill. The detections of antimony in groundwater were also within the range of groundwater background values at Longhorn AAP (Shaw, 2007) indicating antimony is naturally occurring at the site. Therefore, antimony has not been included in the list of contaminants of concern at the site. Since thallium does not have a background value and has had historically high detection limits (2003 and 2004 analytical results), additional groundwater sampling for thallium will be integrated into the RD phase for LHAAP-16.

**Question/Comment:** The Army is using reporting limits for thallium in groundwater that are higher than the EPA MCL. Thus, concentrations of thallium that exceed the MCL may be undetected or unreported. The Army should use a thallium reporting limit that is less than the MCL.

**Response:** Given the results from 1997 (which had appropriate detection limits) and the lack of significant soil results, the U.S. Army considered thallium in the LHAAP-16 groundwater samples to be naturally occurring sporadic detections that were unrelated to site contamination. However, the Army concurs that analytical results in 2003 and 2004 samples had high detection limits and drive the need for further evaluation of thallium. Thus, thallium will be added to the COC list and

will be the subject of additional groundwater monitoring. Monitoring results will be evaluated at the first five-year review to determine if any further monitoring for thallium is warranted.

**Question/Comment:** High concentrations of dioxins and/or furans have been detected in surface water and groundwater at site 16. However, neither dioxins nor furans are included as COCs for surface water or groundwater. The Army should either include dioxins and furans as COCs, or explain why they are omitted.

**Response:** The concentrations of dioxins/furans were evaluated as a composited value for total dioxins/furans based on relative toxicities of the individual chemicals. That composited value is the toxicity equivalent (TEQ), and it can be directly compared with the MCL for dioxin. The highest TEQ dioxin concentration was lower than the MCL, so dioxins/furans were not selected as a COC.

**Question/Comment:** The Army's compliance level for perchlorate in Harrison Bayou is 26 µg/L, which is TCEQ's groundwater medium specific concentration for residential use (GW-Res). However, the EPA's Health Advisory (HA) level for perchlorate is 15 µg/L. Although the HA is not an enforceable MCL, it is reasonable to assume that when it is finally established, the perchlorate MCL will be similar to the HA. The Army should explain why it did not use the HA level as the cleanup level.

**Response:** The cleanup level and surface water compliance level for perchlorate is 17 µg/L, which is the TRRP Tier 1 Groundwater Residential PCL. The cleanup level for perchlorate was revised as a result of dispute resolution between the Army and the EPA. If enforceable limits change in the future, or are newly introduced, the difference between the cleanup level and any such new limits will be subject for discussion during the five year reviews.

**Question/Comment:** The final details of the remedial action will be presented in a Remedial Design (RD). The Army should make the RD available for public review and comment as soon as it is developed. The Army's Proposed Plan does not mention the development of a contingency plan to be invoked if the remedial actions are not performing satisfactorily. A contingency plan should be included in the RD.

**Response:** The public will be provided with updates on remedial design and remedial action status through the RAB meeting and any concerns can be addressed through this forum. The RD will include performance objectives, schedule and other design criteria and will follow established regulatory guidance for MNA.

The concept of a contingency plan for what to do if the remedy is unsuccessful as implemented is inherent in the process of remediation. The remedy must be determined to be operating properly

and successfully. Other opportunities for implementing contingency plans will occur with each five-year review.

**Question/Comment:** The Army reported an average groundwater speed in the shallow zone of 36.7 ft/yr. However, groundwater speeds in the shallow zone range from 0.44 ft/yr - 990 ft/yr.

The higher values may be associated with paleochannels, while the lower values may be associated with ancient overbank deposits that border the paleochannels. When evaluating the transport of contaminants in groundwater, we are usually more concerned with the contaminants that flow most rapidly, rather than those that flow at average or lower speeds.

**Response:** Noted. The groundwater velocity is not directly measured, but is estimated from groundwater gradients and the average of hydraulic conductivities measured in individual wells. There can be considerable variability of hydraulic conductivity from well to well, so using the average hydraulic conductivity is reasonable for calculating the overall groundwater velocity for the entire site.

**Question/Comment:** Alternative 7 seems to be the path of least resistance rather than a proactive approach. It appears the Army is trying to do as little as possible for a very contaminated site and not fix the problems for LHAAP-16. The relative low cost was based on the Army's 30 year payout and the possible length of time to remediate the landfill is projected to be 280 years. More investigation should be conducted before finalizing the plans for Site 16 Landfill.

**Response:** More investigation is not considered necessary to understand the contamination and hydrogeology at LHAAP-16. Additional investigations are unlikely to alter the conclusions that have led to the development of remedial alternatives for the site. Delaying implementation of a remedy to perform more investigations would be less protective of human health than proceeding with the preferred remedy. Besides actively treating the more contaminated portions of the groundwater, the preferred remedy will require monitoring, control of groundwater use, and periodic review of the conditions of the site. The components of the remedy that apply to the more contaminated portions of the groundwater would be implemented within a few years – well within the 30 year period of the cost estimate. Due to the future land use, it is reasonable to utilize monitored natural attenuation to address the remaining contamination over a much longer time period. The preferred remedy has been deemed to be protective of the human health and the environment.

**Question/Comment:** The Army's proposal for dealing with this highly contaminated landfill consist mostly of future monitoring, periodic groundwater water treatment, and implementing some small barrier walls to hopefully slow down the migration of contaminated groundwater into nearby Caddo Lake. Unfortunately, this is already happening, although the Army claims to not

know to what extent. Site 16 landfill remedy has a projected cost of a little less than 2 million dollars for its proposed 30 year clean-up plan. The Army says it will possibly take 280 years to complete the site 16 landfill clean-up; this must indicate that the site is highly contaminated.

**Response:** A landfill cap and cover system was placed over the site and was completed as part of an early IRA. Landfill cap is a presumptive remedy for municipal landfills (USEPA, 1993) and for military landfills (USEPA, 1996). A landfill cap and cover system eliminated the direct exposure pathway to source area waste material, preventing contaminant transport to surface water via surface runoff, and reducing leaching of contaminants to the groundwater The IRA was intended to be consistent with the final remedy and is considered a component of the final remedy being proposed for LHAAP-16.

Rather than slowing the migration of the contamination, the proposed biobarriers and bioremediation injections are intended to destroy much of the identified contamination. The active remedies that apply to the more contaminated portions of the groundwater would be implemented first and followed by monitored natural attenuation. Due to the future land use, it is reasonable for the preferred alternative to utilize monitored natural attenuation to address the areas outside of the active remedies over a much longer time period.

**Question/Comment:** Does the Army have a plan for what it intends to do after the first 30 year segment of the clean-up project has been completed? Could it possibly be the same remedy continued, or a new plan at a much greater cost? Or, could it be that nothing will be done because the sands of time have by then washed away all the records and memory of site 16, leaving it for future generations to unknowingly suffer from and possibly have to deal with?

**Response:** The expectation at this time is that the remedy would continue. At the five-year reviews, the remedy is evaluated and adjusted or changed if necessary.

**Question/Comment**: The remediation cost is $183.00 per day for LHAAP-16 for 'no' removal of many "known" and "unknown" toxic chemicals buried at the site. Site 16 landfill has been determined by the EPA to be so contaminated it is listed as a Federally Funded Military Superfund Clean-up site. There are most likely metal containers of toxic chemicals buried at the site that will eventually rust through and cause additional soil and groundwater contamination beyond what is currently known or detected.

**Response:** A detailed analysis of several alternatives including landfill removal was conducted in accordance with the evaluation criteria identified in the NCP (40CFR 300.430). Advantages, disadvantages, and trade-offs were considered as part of the evaluation process during the feasibility study (Jacobs, 2002). The selected remedy for LHAAP-16 was preferred over other

alternatives because it provides the best combination of major trade-offs, is protective of human health and the environment and is compliant with regulatory requirements.

**Question/Comment**: Nearby Caddo Lake may eventually be home to this toxic waste since it is migrating through the soil and groundwater in that direction.

**Response:** The history of LHAAP-16 indicates the contamination migrates via groundwater flow, not through transport of soil. Contaminated groundwater does exist at LHAAP-16, but is not flowing into Caddo Lake. While sample results for Harrison Bayou surface water indicate that it is within the allowable water quality limits for the contaminants of concern, the groundwater near the bayou has elevated concentrations of those contaminants. The concern for preventing seepage of contaminants to the bayou was a significant factor in proposing a remedial action that includes a biobarrier to intercept that contamination.

## *3.2 Technical and Legal Issues*

This section is used to expand on technical and legal issues. However, there are no issues of that nature beyond the technical issues already discussed in **Section 3.1**.

**LHAAP-17**

# 3.0 Responsiveness Summary

The Responsiveness Summary serves three purposes. First, it provides the U .S. Army, USEPA, and TCEQ with information about community concerns with the preferred alternative at LHAAP-17 as presented in the Proposed Plan. Second, it shows how the public's comments were considered in the decision-making process for selection of the remedy. Third, it provides a formal mechanism for the U.S. Army to respond to public comments.

The U.S. Army, USEPA, and TCEQ provide information regarding LHAAP-17 through public meetings, the Administrative Record for the facility, and announcements published in the Shreveport Times and Marshall News Messenger newspapers. **Section 2.3** discusses community participation on LHAAP-17, including the dates for the public comment period, the date, location, and time of the public meetings, and the location of the Administrative Record. The following documents related to community involvement were added to the Administrative Record:

- Transcript of the public meeting on June 29, 2010
- Presentation slides from the June 29, 2010 public meeting
- Written questions and comments from the public during the public comment period, and the U.S. Army response to those comments dated December 9, 2010.

## 3.1 Stakeholder Issues and Lead Agency Responses

This section responds to significant issues raised by stakeholders including the public and community groups that were received in written or verbal form. The figures that the commenter makes reference to were provided by the commenter.

**Question/comment**: The Army intends to stop pumping and treating groundwater once average perchlorate concentrations are reduced to 20,000 µg/L. According to the Army, high concentrations of perchlorate inhibit the natural attenuation of TCE. However, the Army has not presented any evidence to show that there are significant differences in the attenuation of TCE when the perchlorate concentration is below 20,000 µg/L. In fact, TCE concentrations are increasing at monitor wells 130 and 17WW03, even though perchlorate concentrations at these wells are well below 20,000 µg/L (see figures 1a, 1b, 2a, and 2b on the next page). On the other hand, perchlorate concentrations in monitor well 17WW06 are much higher than 20,000 µg/L, but TCE concentrations are decreasing (see figures 3a and 3b). Thus, there does not appear to be a strong relationship between perchlorate concentrations and the attenuation of TCE. The Army should not rely on a reduction in perchlorate concentrations to result in the attenuation of TCE.

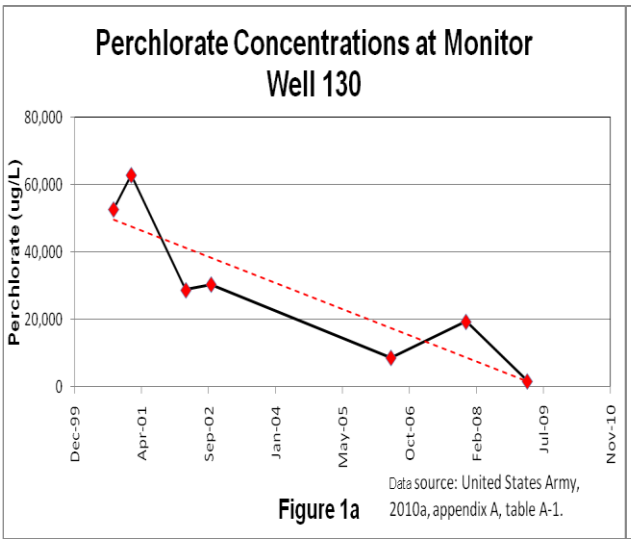


Figure 1a Data source: United States Army, 2010a, appendix A, table A-1.

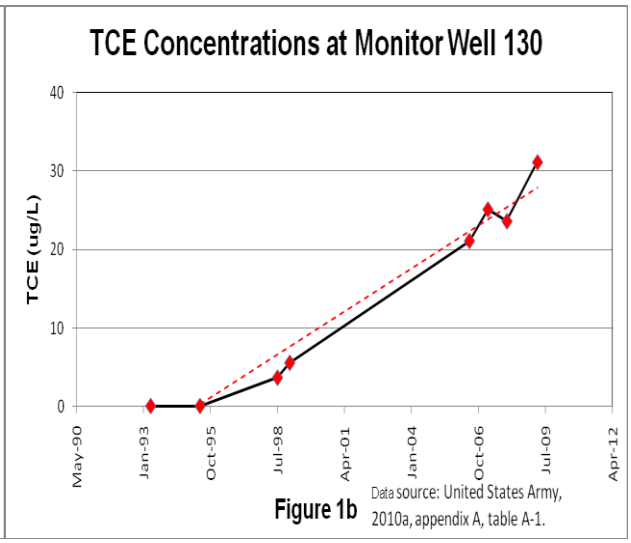


Figure 1b Data source: United States Army, 2010a, appendix A, table A-1.

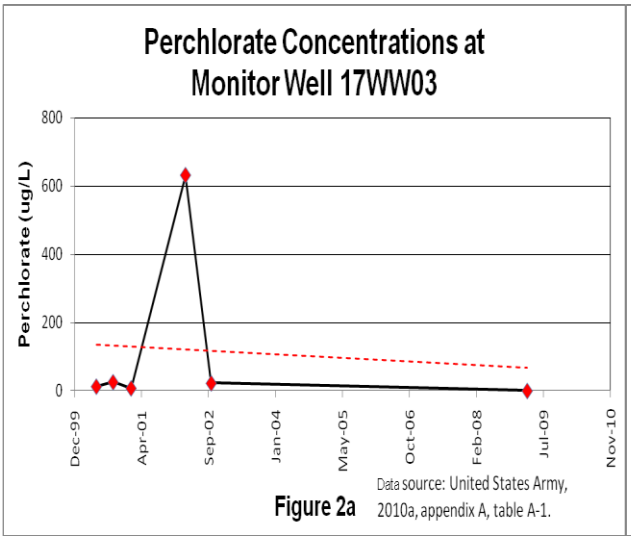


Figure 2a Data source: United States Army, 2010a, appendix A, table A-1.

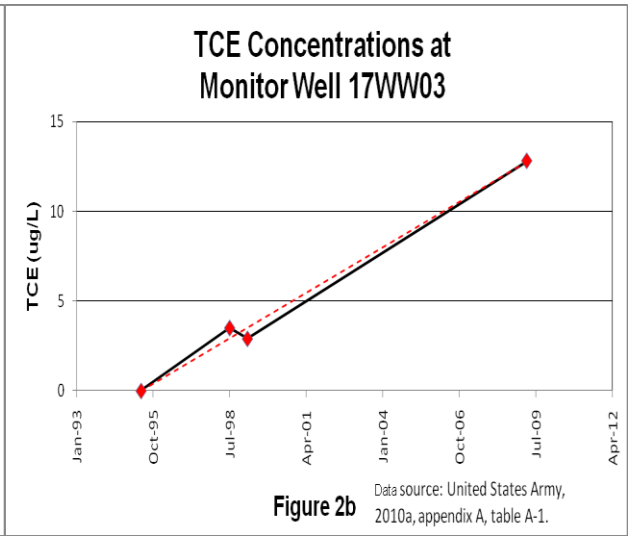


Figure 2b Data source: United States Army, 2010a, appendix A, table A-1.

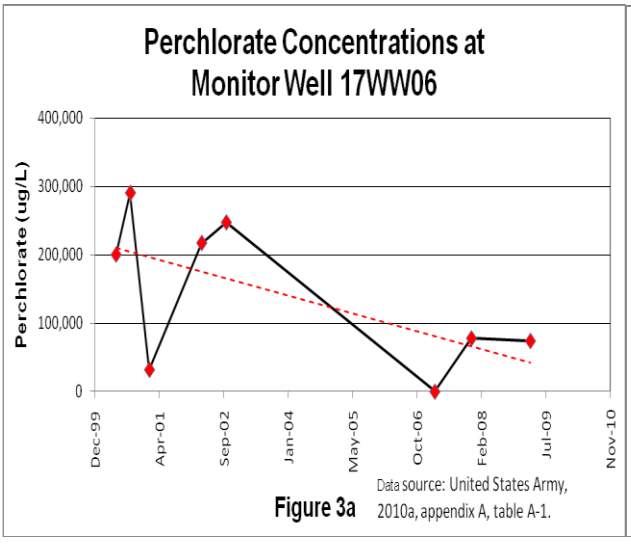


Figure 3a Data source: United States Army, 2010a, appendix A, table A-1.

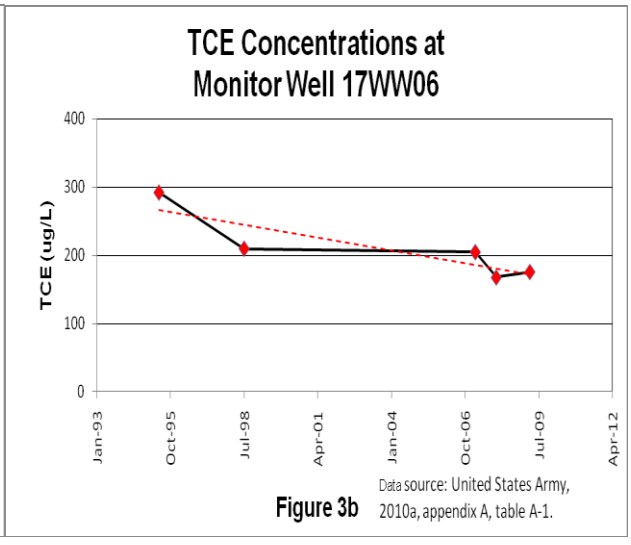


Figure 3b Data source: United States Army, 2010a, appendix A, table A-1.

**Response**: Studies of natural attenuation and guidance for implementing MNA presume that biologically assisted attenuation proceeds from the most easily reduced compounds to the ones that are most difficult. Perchlorate is more easily reduced than TCE. The microbes that metabolize perchlorate are ubiquitous in the natural environment, and there appears to be no potential "stalling" at daughter products (which can happen with TCE). The perchlorate concentration of 20,000 µg/L was selected based on data from LHAAP-17 and another site at Longhorn. At LHAAP-17, observation of the subsurface conditions is complicated by the perchlorate contaminated soil which may add perchlorate to the groundwater via percolation. The performance of natural attenuation to meet remedial action objectives will be evaluated after soil removal, groundwater pumping, and eight quarterly sampling events. If it is found that the performance objectives are not being met with natural attenuation, a contingent remedy such as in situ bioremediation would be implemented.

**Question/comment**: It appears that the Army intends to stop pump and treat once the trigger is reached, regardless of the effect that pump and treat is having on contaminant concentrations. This is not a reasonable approach to contaminant clean-up. The Army should evaluate the effectiveness of pump and treat when the trigger is reached. Then, if it is still having a substantial effect on contaminant concentrations, pump and treat should be continued. The pump and treat system should be operated as long as it is causing significant reductions in contaminant concentrations.

**Response**: The U.S. Army has chosen to implement pump and treat to reduce the highest contaminant concentrations at LHAAP-17 to make conditions more favorable for MNA. Contaminant removal by pump and treat methods operates with diminishing returns – as concentrations decrease, the mass removal rate also falls. Inevitably, a point is reached at which remediation by pump and treat is no longer cost effective. The pump and treat system in conjunction with the site hydrogeological conditions may also be considered ineffective if the system is incapable of reducing perchlorate concentrations at a rate that would be considered productive. As the wording in the comment implies, "substantial effect" and "significant reductions", there is some amount of interpretation involved in deciding when to turn off the pumps. However, pump and treat is not the primary remedy selected or evaluated for LHAAP-17. It is used to assist the primary remedy of MNA by reducing the highest contaminant concentrations. If the pump and treat does not effectively reduce the highest contaminant concentrations in the reasonable time allowed, a contingency remedy such as in situ bioremediation will be implemented.

**Question/comment**: TCE samples have been collected from 11 monitor wells in the shallow zone. TCE concentrations have exceeded the 5 µg/L MCL in six of these wells. Of these six wells TCE concentrations are rising in four, and dropping in two (see figures 1b, 2b, 3b, 4, 5, and 6). The table below shows the most recent TCE concentrations found in the six wells.

Clearly, natural attenuation is not acting to reduce TCE concentrations throughout the site. Although the Army claims that high concentrations of perchlorate are inhibiting the attenuation of TCE, this assertion is not supported by the data (see first comment). The Army should reevaluate its reliance on natural attenuation to reduce TCE concentrations at Site 17.

**Most Recent TCE Concentrations in Shallow Zone Monitor Wells**

| Wells with increasing concentrations of TCE | | Wells with decreasing concentrations of TCE | |
|---|---|---|---|
| Well ID | TCE (µg/L) | Well ID | TCE (µg/L) |
| 130 | 31.1 | 17WW04 | 0.9 |
| 17WW01 | 6090 | 17WW06 | 176 |
| 17WW02 | 867 | | |
| 17WW03 | 12.8 | | |

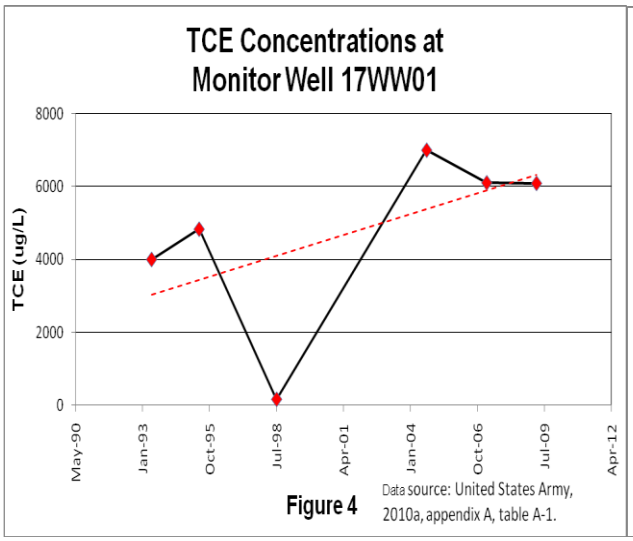


Figure 4 Data source: United States Army, 2010a, appendix A, table A-1.

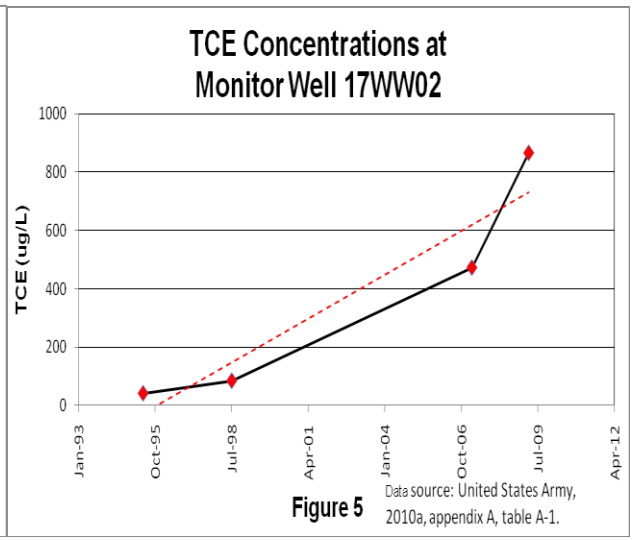


Figure 5 Data source: United States Army, 2010a, appendix A, table A-1.

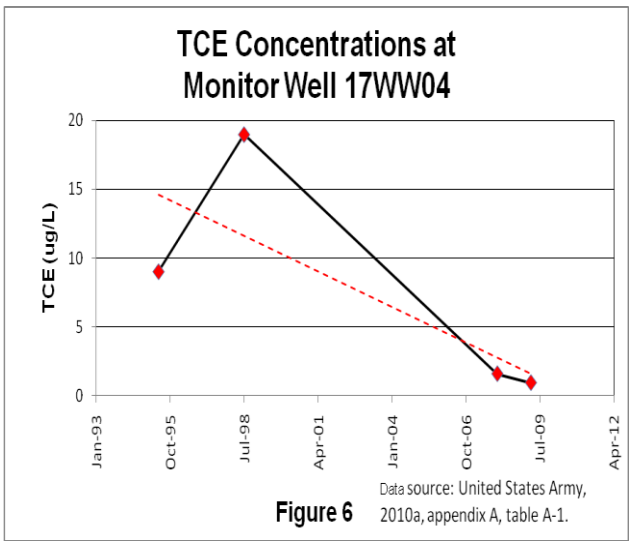


Figure 6 Data source: United States Army, 2010a, appendix A, table A-1.

**Response**: The most significant increase in TCE concentrations is seen at well 17WW01 between 1998 and 2004. TCE concentrations have declined in this well since 2004. Increases in TCE concentrations at wells 130, 17WW02, and 17WW03 are not as significant and may reflect seasonal variations instead of an overall increase in mass. The groundwater gradient at LHAAP-17 is fairly flat and the diffusion of TCE away from 17WW01 may cause a rise in concentrations in the surrounding wells (i.e., 17WW02 and 17WW03). Even though there are fluctuations in the wells at LHAAP-17, the plume is bounded and there does not appear to be a significant migration of the plume. Additionally, pump and treat will contain the plume and will reduce TCE concentrations (prior to MNA evaluation) as well as the perchlorate.

Under current conditions at LHAAP-17, with the addition of perchlorate from contaminated soil by percolation, natural attenuation cannot be effectively evaluated since the high perchlorate concentrations are inhibiting TCE attenuation. After contaminated soil is removed, groundwater pumping will still disturb natural conditions. It is only after soil is removed and pumping is stopped that an effective MNA evaluation may be made. When that evaluation is complete, and if it is favorable, MNA will continue as the remedy. However, if the evaluation is not favorable, another remedy (e.g., in situ bioremediation) will be implemented to reduce the TCE concentrations.

**Question/comment**: The Army estimates that natural attenuation will reduce TCE concentrations in the shallow groundwater zone to the clean-up level (5 µg/L) in less than 120 years. It is not reasonable to propose a plan that could require the maintenance of LUCs for a century.

**Response**: The reasonably anticipated future use of the site is as a wildlife refuge (i.e., Caddo Lake National Wildlife Refuge). Once the property is transferred into the refuge system, the property must be kept as a National Wildlife Refuge unless there is an act of Congress which removes the parcel or the land is exchanged in accordance with the National Wildlife Refuge System Administration Act of 1966 and the National Wildlife Refuge System Act Amendments of 1974. This proposed transfer as a national wildlife refuge, which by its very nature includes physical access and use restrictions, is subject to control and continual inspection by Refuge personnel. Also, the property is intended to remain under ownership and management of a federal government agency. The LUC for groundwater will prohibit access to the groundwater except for environmental testing until cleanup levels are met. Maintenance of the LUC for groundwater use prohibition would require minimal effort and would be reasonable for extended lengths of time. Effectiveness of the LUC will be evaluated as part of the statutory five-year reviews and does not pose additional burden. Additionally, access of groundwater through well installations requires a permit from the Texas Department of Licensing and Regulation or Texas Water District authority. The department will be provided a copy of the county recordation that indicates the location of contaminated groundwater at the site and associated prohibitions.

**Question/comment**: The clean-up time estimate is based on data from monitor well 17WW06, where TCE concentrations are declining (see figure 3b). However, this estimate does not apply to those portions of Site 17 where TCE concentrations are increasing (see third comment). The Army should provide an estimate of clean-up time for the entire site.

**Response**: Although there is some uncertainty associated with the cleanup time for the entire site because of the inhibitive effects of perchlorate, the data collected during the two year period of natural attenuation monitoring (post pump and treat) will be used to remove some of the uncertainties associated with the estimate of time to achieve MCLs. The statutory five-year reviews will evaluate the effectiveness of the remedy and estimated durations to reach MCLs and would recommend implementation of other measures if needed.

**Question/comment**: The Army estimates that natural attenuation will reduce perchlorate concentrations to the clean-up level (17 µg/L) within approximately 15 years. This estimate is based on perchlorate degradation rates (half-lives) calculated for eight monitor wells. However, the Army did not calculate degradation rates for two monitor wells that currently contain high perchlorate concentrations: well 17WW01 (56,000 µg/L) and well 17WW02 (160,000 µg/L). Over the entire period of record, perchlorate concentrations in these two wells have increased, although concentrations in both wells are currently decreasing (see figures 7 and 8). Wells 17WW01 and 17WW02 are important data points that the Army has not accounted for in its estimate. The Army should explain why it did not use data from these wells to estimate the clean-up time for perchlorate at Site 17.

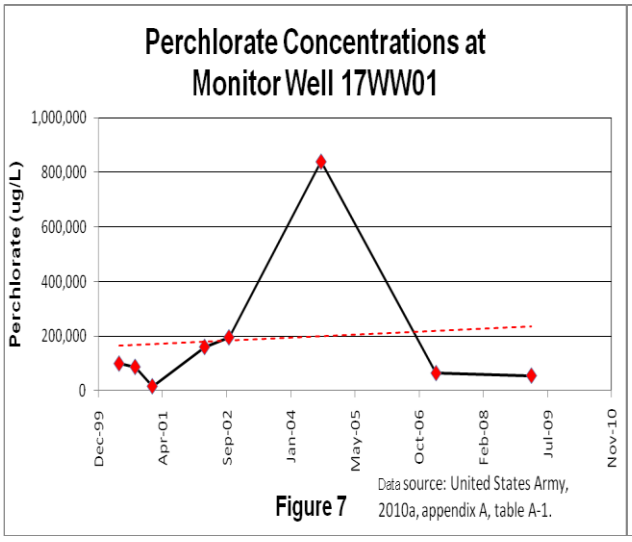


Figure 7 Data source: United States Army, 2010a, appendix A, table A-1.

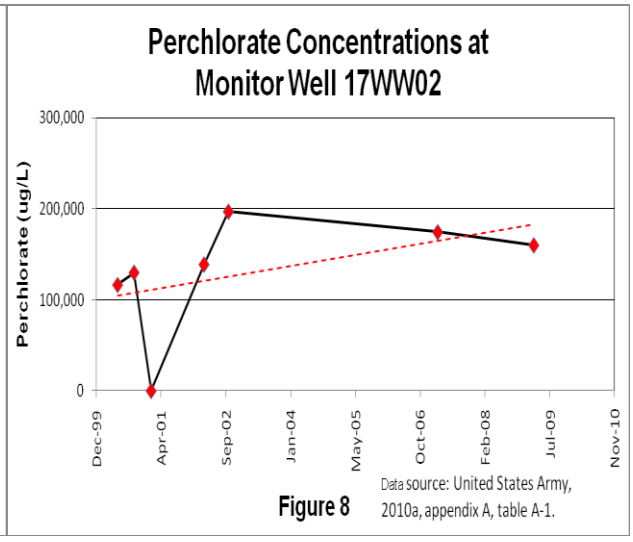


Figure 8 Data source: United States Army, 2010a, appendix A, table A-1.

**Response**: Data from wells 17WW01 and 17WW02 were not used because those two wells appear to be receiving additional perchlorate as it leaches into groundwater from the overlying contaminated soil. The removal of contaminated soil will end this influx, and the pump and treat activity will reduce perchlorate concentrations in the groundwater at those two wells (to

20,000 µg/L). As the perchlorate concentration at 17WW06 (74,000 µg/L) is significantly higher, the U.S. Army feels that the cleanup time estimated for perchlorate at 17WW06 by MNA provides a reasonable estimate.

**Question/comment**: The Army does not consider perchlorate to be a COC in the intermediate groundwater zone. However, high concentrations of perchlorate have been detected in intermediate zone monitor well 17WW11. Therefore, perchlorate should be a COC in the intermediate zone.

**Response**: Well 17WW11 is considered a shallow-intermediate well. There was no distinct clay layer to separate the shallow and intermediate zones. Boring logs for it and surrounding wells were inspected along with groundwater elevations, and it appears to be more reasonably connected with nearby shallow zone monitoring wells than with nearby intermediate zone monitoring wells. As a result, the well 17WW11 has been included with the shallow wells, and within the defined perchlorate plume. Also, perchlorate concentrations were below the detection limit in the intermediate groundwater zone wells (17WW07, 17WW09, 17WW15, and 17WW17).

**Question/comment**: The Army will present details of the soil excavation plan, the pump and treat system, the groundwater remediation performance objectives, the plan for implementing and evaluating MNA, and the LUC implementation plan, in the RD. However, the RD has not yet been produced. Given its importance, the Army should make the RD available for public review and comment as soon as practicable.

**Response**: The public will be provided with updates on remedial design and remedial action status through the RAB meeting and any concerns can be addressed through this forum. The RD will include performance objectives, schedule and other design criteria and will follow established regulatory guidance for MNA.

## *3.2 Technical and Legal Issues*

This section is used to expand on technical and legal issues. However, there are no issues of that nature beyond the technical issues already discussed in **Section 3.1**.

**LHAAP-001-R-01 and -003-R-01**

# 3.0 Responsiveness Summary

The Responsiveness Summary serves three purposes. First, it provides the U .S. Army, USEPA, and TCEQ with information about community concerns with the remedy at LHAAP-001-R and LHAAP-003-R as presented in the Proposed Plan. Second, it shows how the public's comments were considered in the decision-making process for selection of the remedy. Third, it provides a formal mechanism for the U.S. Army to respond to public comments.

The U.S. Army, USEPA, and TCEQ provide information regarding LHAAP-001-R and LHAAP-003-R through public meetings, the Administrative Record file for the facility, and announcements published in the Shreveport Times and Marshall News Messenger newspapers. **Section 2.3** discusses community participation on LHAAP-001-R and LHAAP-003-R, including the dates for the public comment period, the date, location, and time of the public meetings, and the location of the Administrative Record. The following documents related to community involvement were added to the Administrative Record:

- Transcript of the public meeting on July 21, 2011
- Presentation slides from the July 21, 2011 public meeting
- Questions and comments from the public during the public comment period, and the response to comments from the U.S. Army dated July 27, 2011.

Written comments were received from the general public during the public comment period and Proposed Plan meeting in July 2011 for LHAAP-001-R and LHAAP-003-R. The Proposed Plan was finalized without revision. **Appendix A** contains the public announcement for the Proposed Plan meeting and public comment period.

## 3.1 Stakeholder Issues and Lead Agency Responses

This section responds to significant issues raised by stakeholders including the public and community groups that were received in written or verbal form.

**Question/comment:** High concentrations (greater than the MCL) of metals have been found in groundwater at both sites since the early 1980s. In the most recent round of groundwater sampling (2009), high concentrations of beryllium and chromium were detected at site 001-R, and high concentrations of arsenic and chromium were detected at site 003-R.

However, the Army does not intend to monitor metals in groundwater at either site. This is despite the fact that the EPA sent the Army a letter that recommended monitoring metals in groundwater. Letters between the EPA and Army are reproduced in appendix 1.

The Army should monitor metals in groundwater at both sites.

**Response:** Perchlorate and white phosphorus (WP) are the data gap contaminants of concern for LHAAP-001-R and LHAAP-003-R under the Military Munitions Response Program (MMRP). Metals were addressed at sites LHAAP-27 and LHAAP-54, which are co-located with LHAAP-001-R and LHAAP-003-R respectively, under the 1998 Installation Restoration Program (IRP) ROD. Therefore any metals issues/concerns for these two sites must be addressed with respect to the 1998 IRP ROD and would not be included in this Proposed Plan. Army is in the process of reviewing the new metal results and historical results and has committed to respond to EPA and TCEQ under a path separate from the MMRP.

**Question/comment:** Soils at sites 001-R and 003-R are contaminated with a variety of metals (e.g., arsenic, barium, cadmium, lead). However, the Army does not plan to remove contaminated soil from either site.

According to the Army, the contaminants do not represent a threat to human health. However, there are problems with the Army's human health risk assessment (HHRA).

First, many of the soil analyses are not useful because of high detection limits (see below).

Second, the HHRA was performed in 1997. Therefore, it did not use the most recent data. The more recent data shows that some metal concentrations are significantly higher than those used in the HHRA (**Table 3-1**). Also, perchlorate was not included in the HHRA.

**Table 3-1**
**Contaminant Concentrations Used in HHRA**
**Old and New Maximums**

| Contaminant/Site | Old Maximum (mg/kg) | New Maximum (mg/kg) |
|---|---|---|
| Barium/001-R | 123 | 639 |
| Copper/001-R | 18.7 | 41.1 |
| Lead/001-R | 18 | 26.3 |
| Nickel/001-R | 2.41 | 18.6 |
| Thallium/003-R | - | 0.2 |
| Perchlorate/001-R | - | 28.9 (µg/kg) |

The Army should remove contaminated soils from both sites.

**Response:** Please see response to the first comment above.

**Question/comment:** In some cases, the Army used detection limits for metals in soil and sediment that are higher than the standards established to protect human health (see **Table 3-2**). Thus, the Army cannot know whether these contaminants are present in concentrations that threaten human health.

**Table 3-2**
**Detection Limits for Metals in Soil and Sediment**

| Contaminant | Site | Date | Detection Limit (mg/kg) | Standard (TCEQ GWP-Ind, mg/kg) |
|---|---|---|---|---|
| Antimony | 001-R & 003-R | 1982 | 0.76 | 0.6 |
| | 001-R & 003-R | 1993 | 1 | 0.6 |
| | 001-R | 1994 | 1.1-1.3 | 0.6 |
| | 001-R | 1996 | 10.3-10.9 | 0.6 |
| | 003-R | 1996/1997 | 1.1-1.2 | 0.6 |
| Arsenic | 001-R & 003-R | 1982 | 0.3 | 1 |
| | 001-R & 003-R | 1993 | 0.1-1 | 1 |
| | 001-R | 1996 | 2.58-2.74 | 1 |
| | 003-R | 1996/1997 | 0.596-58.7 | 1 |
| | 001-R & 003-R | 2003 | 0.52-0.54 | 1 |
| Beryllium | 001-R & 003-R | 1982 | 0.5 | 0.4 |
| | 001-R | 1997 | 0.62-0.77 | 0.4 |
| | 001-R & 003-R | 2003 | 0.20-0.22 | 0.4 |
| Cadmium | 001-R & 003-R | 1982 | 0.5 | 0.5 |
| | 001-R & 003-R | 1993 | 1 | 0.5 |
| | 001-R | 1994 | 0.56-0.63 | 0.5 |
| | 001-R | 1996 | 2.06-2.19 | 0.5 |
| | 003-R | 1996/1997 | 2.22-2.38 | 0.5 |
| | 001-R & 003-R | 2003 | 0.25-0.27 | 0.5 |
| Thallium | 001-R & 003-R | 1982 | 3 | 0.2 |
| | 001-R & 003-R | 1993 | 0.2 | 0.2 |
| | 001-R | 1994 | 0.55-1.2 | 0.2 |
| | 001-R | 1996 | 15.5-16.4 | 0.2 |
| | 003-R | 1996/1997 | 0.6 | 0.2 |

The Army should re-sample soil and sediment at both sites. The samples should be analyzed using detection limits that are lower than the human health-based standards.

**Response:** Please see response to the first comment above.

**Question/comment:** The Army does not appear to have done the work required to determine groundwater flow directions at either site. Effective and efficient groundwater monitoring cannot be performed unless groundwater flow directions are known.

The Army should produce maps showing groundwater flow directions at each site.

**Response:** Hydrogeology was already addressed at sites 001-R and 003-R under the 1998 IRP ROD (see 1997 Remedial Investigation Report). Based on the Hydrogeological Assessment, the groundwater and surface flow direction at LHAAP-003-R are to the northwest and parallel to Sanders Branch and Harrison Bayou and at LHAAP-001-R groundwater flow is northerly. In addition, groundwater surface data from May 2000 (attached) for monitoring wells 127, 128 and 18WW16 at site LHAAP-003-R has been evaluated and confirms a northwest groundwater flow direction. Groundwater surface data from May 2000 for monitoring wells 27WW01, 27WW02, 27WW03, 27WW04, 131 and 132 at site LHAAP-001-R confirm a groundwater flow direction to the northeast. Maps showing groundwater flow direction at each site are attached as **Appendix B**.

**Question/comment:** There are six monitor wells at site 001-R, and four monitor wells at site 003-R. In addition, one-time grab samples were obtained from borings at each site.

The Army does not know whether there are a sufficient number of monitor wells at each site because it does not know whether the wells are down gradient of contaminated areas (see above comment on groundwater flow directions). The Army should evaluate the need for additional monitor wells after it has determined groundwater flow directions at each site.

**Response:** Please see the above response. Hydrogeology was already addressed at these sites.

**Question/comment:** The Army is using a groundwater standard for perchlorate of 72 µg/L. However, the EPA health reference level (HRL) for perchlorate is 15 µg/L. In addition, the EPA has decided to establish a primary drinking water standard (MCL) for perchlorate. When established, the perchlorate MCL will probably be similar to the HRL.

If the Army abandons the monitor wells based on the 72 µg/L standard, it may have to re-install monitor wells when the EPA establishes an MCL for perchlorate.

Until the EPA establishes an MCL for perchlorate, the Army should use a standard that is no greater than 15 µg/L.

**Response:** The Army is using the TRRP Tier 1 Groundwater Residential PCL of 17 µg/L for comparison of perchlorate in groundwater.

**Question/comment:** The Army has analyzed soil and water samples for two isomers of dinitrotoluene (DNT): 2,4-DNT and 2,6-DNT. These are the most common isomers in technical grade DNT. However, there are four other isomers of DNT (2,3-DNT; 2,5-DNT; 3,4-DNT; and 3,5-DNT). All of the isomers are toxic.

At the Badger Army Ammunition Plant, high concentrations of the other isomers have been found in groundwater. In some cases, concentrations of the other isomers are significantly higher than the concentrations of 2,4-DNT and 2,6-DNT.

The Army should analyze soil and water samples for all isomers of DNT, not just the 2,4-DNT and 2,6-DNT isomers.

**Response:** At this time, there are no Federal or State of Texas promulgated screening levels for DNT isomers, other than for 2,4-DNT and 2,6-DNT. However, as part of the CERCLA process, the statutory five-year reviews will evaluate the effectiveness of the remedy, including any changes in ARARs concerning DNT isomers, and would recommend implementation of other measures if needed.

**Question/comment:** The Army has developed source-receptor conceptual site models for munitions constituents and OE at LHAAP sites 001-R and 003-R. The Army should also develop source-receptor conceptual site models for metals at both sites.

**Response:** Please see response to the first comment above.

**Question/comment:** The following documents were listed as primary reference documents in the Final Proposed Plan. However, they do not appear to have been included in the Army Administrative Record.

- CAPE, 2007b, Final Engineering Evaluation/Cost Analysis Action Memorandum Revision 1, Longhorn Army Ammunition Plant, Karnack, Texas, Signed by Thomas Lederle, BRAC Division, ACSIM, United States Army, 5 December.
- Environmental Protection Systems, Inc. (EPS), 1984, Longhorn Army Ammunition Plant Contamination Survey, June.
- EODT Technology, Inc., (EODT), 2009, Final Site Specific Final Report for the MEC Removal Action at the Former Longhorn Army Ammunition Plant, LHAAP-001-R (Site 27) and LHAAP-003-R (Site 54), Karnack, Texas, September.

The Army should ensure that all documents referred to in the Proposed Plan are included in the Administrative Record. If any document has been misfiled or mislabeled in the Administrative Record, the Army should so indicate when referring to that document.

**Response:** The Final Engineering Evaluation/Cost Analysis Action Memorandum, signed by Thomas Lederle 5 December 2007, is located in the Administrative Record in Volume 9, Year 2008. It is listed out of date in sequence.

The other two references appear to have been overlooked and will be incorporated into the Administrative Record.