Notice of Availability of Final Records of Decision
for LHAAP-04 Environmental Site
Longhorn Army Ammunition Plant, Karnack, Texas

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

ROD signed March 30, 2017
LHAAP-04, Former Pilot Wastewater Treatment Plant; Selected Remedy: In-situ bioremediation, long-term monitoring, and Land Use Controls (LUCs);

Copies of the signed ROD is 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 this site, 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.

The Responsiveness Summary from the Final ROD for LHAAP-04 is 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-04

3 RESPONSIVENESS SUMMARY

The Responsiveness Summary serves three purposes. First, it provides the U. S. Army, USEPA, and the TCEQ with information about community concerns with the Preferred Alternative at LHAAP-04 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, the USEPA, and the TCEQ provide information regarding LHAAP-04 through public meetings, the Administrative Record for the facility, and announcements published in the Marshall News Messenger newspapers. **Section 2.3** discusses community participation on LHAAP-04, 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 January 9, 2013
- Presentation slides from the January 9, 2013 public meeting
- Written questions and comments from the public during the public comment period, and the U.S. Army response to those comments.

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.

3.1.1 Question/Recommendation No. 1

Extent of groundwater contamination: The only monitor well at the site, well 04WW04, contains high concentrations of perchlorate. This well is only 18 feet deep. A single well is insufficient. Both the lateral and vertical extent of groundwater contamination are unknown.

Recommendation: The three additional monitor wells the U.S. Army plans to install will better define the extent of contamination.

Response – The LHAAP-04 site is currently monitored by a total of seven wells, although only one well is technically within the very small area of the site (approximately 150 feet by 150 feet). The site is well-monitored as the remainder of the wells are within 250 feet of the impacted well, Three additional wells planned for installation as part of the RD will help further refine the perchlorate plume footprint and depth of contamination..

3.1.2 Question/Recommendation No. 2

Groundwater Contaminants: Samples from well 04WW04 do not appear to have been analyzed for contaminants other than perchlorate. Other groundwater contaminants may be present.

Recommendation: The U.S. Army should sample all monitor wells and the fire station well for all contaminants that might reasonably be expected to occur at the site. In addition to perchlorate, this would include volatile organic compounds (VOCs) (e.g., methylene chloride, trichloroethylene, explosives (e.g., TNT, DNT), and metals (e.g., arsenic, thallium). If

contaminants are found that are not amenable to restoration under the Proposed Plan (e.g., metals), the U.S. Army should modify the plan to ensure that all the contaminants will be cleaned up.

Response – Groundwater samples from three shallow monitoring wells (04WW01, 04WW02, and 04WW03) were analyzed for VOCs, SVOCs, metals, pesticides, PCBs, explosives, perchlorate, and dioxins/furans during the RI (Jacobs, 2003). No VOCs, SVOCs, perchlorate, pesticides, explosives, and PCBs were detected in the samples. Inorganic constituent concentrations were detected at or lower than the protective concentration level (PCL) or background comparison levels. Eight dioxin/furan compounds (with no established MCL or PCL) were detected in groundwater samples (Jacobs, 2003). Subsequently, perchlorate was identified as the only groundwater COC at the site with its source being historical perchlorate impacts in soil. Parameters, other than those discussed in the Proposed Plan and the ROD, will not be added to the monitoring program.

3.1.3 Question/Recommendation No. 3

Residual soil contamination: The U.S. Army has stated that contaminated soil probably remains beneath some portions of the site.

Recommendation: The U.S. Army should either perform an assessment to determine whether the contaminated soil is likely to be a source of groundwater contamination, or explain why such an assessment is not necessary.

Response – Residual contaminated soil, if any, is likely to be restricted to the two grid areas FL09 and FL11 (where confirmation samples could not be collected due to groundwater infiltration). Contaminated soil was removed from these two areas up to depths of 14 ft bgs. However, samples collected from the remaining north side wall just above the groundwater interface indicated perchlorate concentrations less than cleanup levels. Residual soil contamination, if any, is likely to be in the saturated zone and will be addressed as part of groundwater remedy.

3.1.4 Question/Recommendation No. 4

Concrete slab: The U.S. Army does not appear to have investigated the soil or groundwater beneath the concrete slab.

Recommendation: The U.S. Army should either perform an investigation, or explain why it is not necessary.

Response –The concrete slab was penetrated in six locations near the tank pad/foundations. See **Figure 2-2** of the Final Removal Action Work Plan (Shaw, 2009c). Based on perchlorate results from soil samples taken from under the slab, a section of the concrete was removed. See **Figure 2-1** and **Figure 2-8** of the Final Completion Report (Shaw, 2011). Soil was excavated to a depth of five feet below top of concrete in section FL08 and to a depth of twelve feet below top of concrete in section FL07. Perchlorate concentrations in final floor confirmation samples from FL07 and FL08 were less than the GWP-Ind MSC. Monitoring well 04WW04 is located adjacent to the concrete slab and soil removal at section FL07. Therefore, further investigation beneath the concrete slab is not warranted.

3.1.5 Question/Recommendation No. 5

Perchlorate cleanup standard: The U.S. Army's cleanup standard for perchlorate in groundwater is the same as the State of Texas' standard for industrial use (GWP-Ind): 72 µg/L. However, the USEPA has decided to regulate perchlorate under the SDWA and has established an Interim Drinking Water Health Advisory of 15 µg/L. The USEPA and the Army are currently discussing this issue.

Recommendation: Pending the outcome of discussions with the USEPA, the Army should assume that the perchlorate cleanup will be 15 µg/L, and plan accordingly.

Note – The purpose of excavating the perchlorate contaminated soils was to protect the underlying groundwater. A more stringent perchlorate groundwater standard may mean that the cleanup standards for soils will also have to be more stringent.

Response – The cleanup 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.

3.1.6 Question/Recommendation No. 6

Surface water modeling: The U.S. Army has concluded that contaminated groundwater will not adversely affect surface water in Goose Prairie Creek. This conclusion is based on modeling performed in 2007. However, in its Proposed Plan for LHAAP-47, the U.S. Army stated that the uncertainties associated with the model were unacceptable, and it would not be used to assess the effect of groundwater contaminants on Goose Prairie Creek.

Recommendation: The U.S. Army should explain why it is using the model at LHAAP-04 but not at LHAAP-47.

Response – References to use of surface water modeling for LHAAP-04 will be removed from this and the future documents. Surface water directly overlies the LHAAP-47 plume and surface water monitoring is planned in conjunction with the final remedy for that site. At LHAAP-04 surface water is not located on the site directly on top of the groundwater plume. It is located ~700 feet from the site and based upon the localized, small nature of the plume, no impact to surface water is anticipated. Surface water data from 2010 and 2011 indicates perchlorate concentrations below TRRP Tier 1 Groundwater Residential PCL.

3.1.7 Question No. 7

Public Comment Period: What is the duration of the public comment period? When does the public comment period end?

Response – The duration of the public comment period is 30 days. The period began on January 1, 2013, and was extended through January 31, 2013.

3.1.8 Question No. 8

Cleanup Level for Perchlorate in Groundwater: The U.S. Army proposes that the cleanup level for perchlorate in groundwater be 72 µg/L whereas the USEPA states that the cleanup level for perchlorate shall be 15 µg/L. The U.S. Army may have to switch over and use 15 µg/L as the cleanup level.

Response – The cleanup 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.

3.1.9 Question No. 9

Growth of Microorganisms during ISB: How do you encourage the growth of microorganisms? What is the relationship between microorganisms' growth and reduction in contaminants?

Response – The material (substrate) that is injected into the aquifer during ISB provides the food source for the growth of native microorganisms in the aquifer. These microorganisms increase in population (via reproduction) and during the corresponding metabolism, they break down the contaminants in groundwater.

Perchlorate, the COC in groundwater at LHAAP-04 site is more amenable to ISB than some other contaminants found at the LHAAP. Evaluation of data collected quarterly in the first two years of the ISB implementation will help determine need for additional injections (additional substrate into the aquifer), or bioaugmentation culture (to add/enhance the right type of microbes into the aquifer). Providing the substrate (food source) to the microbes helps sustain and grow their population with corresponding decrease in the COC levels until the cleanup level is attained.

3.1.10 Question No. 10

Submittal of Questions and Appropriate Response: If someone sends in written comments to the U.S. Army, who does it go to, who actually reads them, who responds, do they respond to all comments?

Response – Dr. Rose Zeiler, with the U.S. Army is the point of contact for correspondence associated with comments/responses. Dr. Zeiler's official contact information (mail, email, and telephone no.) is provided in the Proposed Plan. Formal comments are accepted verbally at the public meeting or via email or mail sent to the attention of Dr. Zeiler. All written comments on the Proposed Plan should be submitted to her. Verbal comments asked during the public meeting are captured by the court reporter. A concerted response from the team is provided to the comments and included in the Responsiveness Summary of the ROD. Similar questions are grouped together and a comprehensive answer is provided to that group of questions.

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**.