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DEPARTMENT OF THE ARMY
ST. LOUIS DISTRICT, CORPS OF ENGINEERS
8945 LATTY AVENUE
BERKELEY, MISSOURI 63134

January 17, 2008

REPLY TO ATTENTION OF:

Formerly Utilized Sites Remedial Action Program (FUSRAP)

SUBJECT: Iowa Army Ammunition Plant, FUSRAP FFA CERCLA-07-2005-0378 – Request for Extension of Submittal of Draft Remedial Investigation Report

Mr. Scott Marquess
U. S. Environmental Protection Agency
Region VII
901 North 5th St.
Kansas City, Kansas 66101

Dear Mr. Marquess:

Reference Federal Facility Agreement (FFA) under CERCLA Section 120, Administrative Docket Number CERCLA-07-2005-0378 between the U.S. Environmental Protection Agency (EPA), the State of Iowa, Department of Energy and the U.S. Army Corps of Engineers for the Iowa Army Ammunition Plant (IAAAP).

Reference correspondence from the U.S. Army Corps of Engineers, St Louis District to the EPA, SUBJECT: Iowa Army Ammunition Plant, FUSRAP FFA CERCLA-07-2005-0378 – Request for Extension of Remedial Investigation (RI) Field Work and Submittal of Draft RI Report, dated May 3, 2007. This correspondence established a target date of October 7, 2007 for the submittal of the draft RI report.

The USACE proposes a 120 day extension for the submittal of the draft RI report, the exclusion of the Line 1 and West Burn Pads (south of the road) areas from the RI report and the addition of a target date for the completion of a draft Remedial Design/Remedial Action Work Plan (RD/RAWP) document for the Line 1 and West Burn Pads areas. The approval of this proposal will impact subsequent activities.

The basis of this request is as follows:

- a. In an effort to expedite the overall remediation of the Iowa Army Ammunition Plant and to reduce the cost of the remediation, the Corps intends to pursue the disposal of Line 1 and West Burn Pads (south of the road) (WBPS) contaminated soils in the Inert Disposal Area per the EPA Superfund Record of Decision: Iowa Army Ammunition Plant, OU-1, Middletown, Iowa, dated March 4, 1998. Following this course of action results in a change to the scope of the current internal draft RI report (i.e. deletion of the Line 1 and West Burn Pads south (WBPS) areas) and the development of an expedited design document addressing the removal and

ACB
Bonstead
OC

MF
Frerker
EC-HQ

Parks
PM-R
out of office

Cotner
PM-R
[Signature]

disposal of Line 1 and WBPS soils in the Inert Disposal Area. In addition, this disposal action will necessitate additional coordination with the Army Environmental Center in order to avoid delays to the completion of their on-going remedial activities and the closure of the Inert Disposal Area. In addition our data suggests the presence of Polynuclear Aromatic Hydrocarbons (PAHs) in some of the soils at Line 1. Upon your review of this data, we may propose modification of the existing Record of Decision to allow for disposal of such soils in the IDA.

b. Additional samples were required to sufficiently delineate contamination for the RD/RAWP document. Additional time was required to collect, analyze and incorporate this information in the RD/RAWP.

USACE believes that the above reasons represent good cause for this extension under the FFA.

Please see the table below for the proposed target dates.

	<u>Current Target Date</u>	<u>Proposed Target Date</u>
Submittal of draft RI Report	October 7, 2007	February 11, 2008
Draft RD/RAWP (Line 1 & WPBS)	None	March 24, 2008

It should be noted that this schedule is based upon an agreement between the Corps of Engineers and the Army Environmental Center allowing the Corps to deposit Line 1 and WBPS contaminated soils in the Army's Inert Disposal Area (IDA). Failure of this agreement will result in a future modification of this schedule because the Line 1 and WBPS soils will have to be incorporated in the draft RI report and there will be no need for a RD/RAWP document.

Copies of this letter have been sent to the other FFA parties and the Installation Management Division at the Iowa Army Ammunition Plant. If you have any questions regarding this request for extension please contact me at 314-260-3915.

Sincerely,

Sharon R. Cotner
FUSRAP Program Manager

CF:

Mr. Dan McGhee, Iowa Department of Public Health
Mr. Christopher Clayton, U.S. Department of Energy
Mr. Steven Bellrichard, Iowa Army Ammunition Plant

Cotner, Sharon R MVS

From: Cotner, Sharon R MVS
Sent: Tuesday, January 22, 2008 11:40 AM
To: 'linda.wobbe@us.army.mil'
Subject: FW: IOWA FFA Extension - revision

Attachments: IOWA FFA Extension.pdf



IOWA FFA
Extension.pdf (395 K)

Linda,

For your info:

I am sending to you in lieu of Steve. Sorry this took a little longer. I had to locate your email address.

I have also sent this to Iowa DPH by email today.

Thanks,
Sharon

-----Original Message-----

From: Cotner, Sharon R MVS
Sent: Friday, January 18, 2008 3:40 PM
To: 'Marquess.Scott@epamail.epa.gov'; 'Clayton, Christopher'
Cc: 'Allison, Rodger CIV USA USAMC'
Subject: FW: IOWA FFA Extension - revision

Scott and Chris,

Attached is a PDF of our letter regarding the schedule extension at Iowa. I will send to Steve Bellrichard and Dan McGee on Tuesday (when hopefully I can find their email addresses.)

Sharon

Cotner, Sharon R MVS

From: Cotner, Sharon R MVS
Sent: Tuesday, January 22, 2008 10:08 AM
To: dmcghee@idph.state.ia.us
Subject: FW: IOWA FFA Extension - revision

Attachments: IOWA FFA Extension.pdf



IOWA FFA
Extension.pdf (395 K)

Dan,

Attached is a PDF file of the letter we sent to Scott requesting a change in our schedule. I hope this finds you healthy.

If you have any questions give Ron Frerker (314-260-3936) or me (314-260-3915) a call. (Now I've just got to find the new person at IAAAP's address!)

Thanks,
Sharon

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From: Cotner, Sharon R MVS
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