



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

*Project file*

REPLY TO  
ATTENTION OF:

April 26, 2001

Formerly Utilized Sites Remedial Action Program

SUBJECT: Draft Final Iowa Army Ammunition Plant Scoping Survey Plan for Firing Site 6 and 12, -- Response to Comments

Messrs. Leon Baxter and Roger Allison,  
Iowa Army Ammunition Plant  
17571 State Highway 79  
Middletown, IA 52638-5000

Dear Messrs. Baxter and Allison:

Please find enclosed the responses to your comments on the Draft Final Iowa Army Ammunition Plant Scoping Survey Plan for Firing Site 6 and 12. If you have any questions regarding the responses to your comments, contact me at (314) 260-3915 or Mr. Dennis Chambers at (314) 260-3917

Sincerely,

A handwritten signature in cursive script that reads "Sharon R. Cotner".

Sharon R. Cotner  
FUSRAP Program Manager

Enclosure

**DRAFT FINAL IAAAP SCOPING SURVEY PLAN FOR FIRING SITES 6 AND 12  
 RESPONSES TO COMMENTS MADE BY THE  
 IOWA ARMY AMMUNITION PLANT AND AMERICAN ORDNANCE, LLC**

Comments received from: Leon Baxter, SMAIA-IN, (319)753-7101 and Rodger Allison, SMAIA-IN-E, (319)753-7130

No.	pp/§/¶	Commentor	Comment	Response
1	General	L. Baxter	What is the time frame for this activity? American Ordnance (AO) is still using FS-6 and may have test fire requirements. This walk over will have to be coordinated with AO.	The USACE and its contractors intend to be on site the week of April 30, 2001 to May 5, 2001 (Monday – Saturday). The surveyors plan to work 10 hour days Monday – Friday and at least a half a day on Saturday. It is expected that survey and sampling efforts at FS 6 will take 1 day. Please advise which day will be available for these survey and sampling activities.
2	pg. 1/§2.0	L. Baxter	American Ordnance Company is American Ordnance, LLC.	Correction will be made to document.
3	pg. 5/ Table 3-1	L. Baxter	Shouldn't someone from the on-site Project Manager's office be listed? Suggest listing Leon Baxter, On-Site Project Manager, (319)753-7101 or Rodger Allison (alternate) (319)753-7101.	Leon Baxter will be listed in the table as the On-Site Project Manager.
4	General	R. Allison	This document is listed as draft final, has there been other versions of this document? Generally per our IAG with EPA we are required to process a draft and draft final versions to the EPA. We understand and appreciate the efforts in expediting this effort.	To expedite the review process only the draft final version of the scoping survey plan is being provided to the EPA for their review. A draft version of this document, created by SAIC (radiological survey contractor), was reviewed by the USACE St. Louis District Health Physicist (Dennis Chambers) and the USACE HTRW Center of Expertise Health Physicist (Luke McCormick).
5	General	R. Allison	It is unclear how the information gathered in this survey will be merged with the Army's effort to clean up chemical contamination at this site? Our expectations are that the Project Manager, COE Omaha District will merge information from this effort into the chemical aspect.	The data/information gathered in this survey will be furnished to the Omaha District Project Manager for use as he deems appropriate.

**DRAFT FINAL IAAAP SCOPING SURVEY PLAN FOR FIRING SITES 6 AND 12  
 RESPONSES TO COMMENTS MADE BY THE  
 IOWA ARMY AMMUNITION PLANT AND AMERICAN ORDNANCE, LLC**

Comments received from: Leon Baxter, SMAIA-IN, (319)753-7101 and Rodger Allison, SMAIA-IN-E, (319)753-7130

6	Figure 3	R. Allison	The entire area that has been scraped should be surveyed as contamination may have been spread by equipment during scraping.	The survey at FS 12 will begin at the historical "ground zero" and extend 100 meters in all directions from this point. As time allows, areas outside this initial survey area may be surveyed. These additional surveys would focus on those areas most likely to be contaminated based on the results of the walkover of the initial survey area.
7	\$5.3	R. Allison	This plan is very vague. Will soil sampling be performed at ALL elevated levels or just the 7 and 10 highest?	Sample numbers are limited to the amounts stated in the plan (i.e., 7 for FS 6 and 10 for FS 12). If the walkover surveys identify more areas than the allotted sample amounts, the survey supervisor will choose sample locations in an attempt to define the range of elevated activity that exists at each site. Specifically, this will be accomplished by collecting at least one sample in each new 10,000 cpm interval encountered during the gamma walkover survey. For example, if 3 separate areas of elevated activity are identified but all are within 10,000 cpm of each other, only 1 sample will be collected. If no elevated areas of contamination are identified or if the range of gamma counts is so narrow that division is unreasonable, samples will be collected at systematic locations in accordance with the plan. The plan will be revised to include this additional detail.
8	. \$5.3	R. Allison	Are the samples to be taken during the walk over or after the walk over is completed?	See response to Comment # 7. At least one sample will be collected during the walkover survey in each new 10,000 cpm interval. All other samples will be collected after the survey supervisor has had the opportunity to review the data and decide where samples should be collected.
9	\$5.3	R. Allison	Shouldn't the Class 2 survey grid locations (assuming 30 samples) be included in this plan?	The plotting of 30 samples/survey unit relies on many assumptions which may or may not be valid. The USACE expects only a small number for samples (i.e., 2-3) will be collected from predefined systematic locations. The inclusion of these locations may be premature at this point.

**DRAFT FINAL IAAP SCOPING SURVEY PLAN FOR FIRING SITES 6 AND 12  
 RESPONSES TO COMMENTS MADE BY THE  
 IOWA ARMY AMMUNITION PLANT AND AMERICAN ORDNANCE, LLC**

Comments received from: Leon Baxter, SMAIA-IN, (319)753-7101 and Rodger Allison, SMAIA-IN-E, (319)753-7130

10	\$8.0	R. Allison	Will AO be handling waste disposition or will this be coordinated with OSC? Who will make this coordination if needed? AO? Army?	USACE and its contractor anticipated placing the any DU fragments and associated PPE in the drum that exists after the November 2000 investigation of FS 12. Prior to demobilization, the USACE and its contractor would ensure the waste is properly contained, labeled, and stored and then would formally turn the waste over to the appropriate party for disposition.
11	\$A.1	R. Allison	Is there a reason the residential standards are being used? All other CERCLA sites are being cleaned to industrial standards. Will this be precedent setting?	Appendix A is provided in an effort to show that the chosen screening level DCGL is protective of human health and the environment. In the CERCLA process, sites are initially "screened" using preliminary remediation goals (PRGs) or analogously, screening level DCGLS. These values are typically conservative values that are based on residential use scenarios and are used by facilities and regulatory agencies as a screening tool to decide if further action is required at the facility.  If all the data collected during the scoping survey is below this screening value, no further action is required. If all or some of the data is above this value, the site would be required to proceed in the CERCLA RI/FS/ROD process. During this process, land use determinations will be made and site specific cleanup goals will be established. In many cases these values are much larger than the initial screening level values used during the scoping survey. The approach documented in the scoping survey plan is consistent with the CERCLA process.