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FUSRAP

“Formerly Utilized Sites Remedial Action Program”

26 July 02

**Briefing for the Honorable Thomas J. Vilsack
Governor of Iowa**

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Agenda

- What is FUSRAP?
- Background
- What is the role of the IDPH?
- The IAAAP Preliminary Assessment
- What's Next?
- Issues
- Site wide Survey
- Radiological Flyover Survey
- Our Commitment



What is FUSRAP?

- Formerly Utilized Sites Remedial Action Program
- Clean up sites contaminated with radioactivity resulting from Atomic Energy Commission (AEC) and Manhattan Engineer District (MED) work as part of the Nation's early atomic energy program.
- Established by Dept. of Energy (DOE) in 1974.
- Congress transferred to Corps in Oct 1997.

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- The Corps of Engineers has directly received an average annual budget of \$140 million for the last several years.
- There are currently 21 sites in 9 states nationwide to be investigated and cleaned up if warranted.
- FUSRAP cleanups are executed in accordance with the Comprehensive Environmental, Response, Compensation and Liability Act (CERCLA) and the National Contingency Plan (NCP).
- The St. Louis District Corps of Engineers is responsible for management and execution of FUSRAP at the Iowa Army Ammunition Plant (IAAAP).



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IAAAP Background

- **1997 - FUSRAP program execution transferred to Corps on October 13th (Public Law 105-62).**
- **1999 - Memorandum of Understanding for FUSRAP responsibilities signed between Corps and Dept. of Energy (DOE).**
 - Two primary responsibilities for DOE
 - Corps manages execution

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1999 - Memorandum of Understanding for FUSRAP between Corps and DoE.

- Under the MOU, The Corps manages execution (planning, design, cleanup). The DOE has two primary responsibilities:
 - Identifying potential sites for inclusion
 - Performance of Long Term Stewardship mission beginning two years after the Corps completes the site cleanup

March 2000 - IAAAP referred by Dept. of Energy (DOE) for FUSRAP eligibility

August 2000 - The Corps begins a Preliminary Assessment

September 2000 - DOE identifies chunks of depleted uranium on the surface at Firing Site 12 while completing a prior commitment for a building survey.

October 2000 - The IAAAP Commander restricts access to Firing Site 12

April / May 2001 - The Corps conducts a limited walkover radiological survey and performs limited sampling at Firing Sites 6 and 12 to ensure that there is no immediate danger to the public.

December 2001 - The Preliminary Assessment is completed and distributed to the site stakeholders (IAAAP, IDPH, USEPA, DOE, OSC, Corps Headquarters, etc.).

July 2002 - IAAAP included in FUSRAP Program



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What is the Role of the IDPH?

- Comparable to its role on any other CERCLA action
- Corps expects the Iowa Department of Public Health (IDPH) to:
 - advise,
 - provide input,
 - and participate in cleanup process at the IAAAP.

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The IDPH will:

- Advise the Corps, particularly with regard to the cleanup criteria during the planning process
- Provide review and comments on documents
- Participate in the decision making process at the IAAAP
- Provide input / concurrence that final cleanup goals are met on remediation



The IAAAP Preliminary Assessment

- **Purpose**
- **Draft Preliminary Assessment was reviewed by stakeholders.**
- **Corps incorporated applicable comments.**
- **Included information from a number of sources.**

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Purpose of the Preliminary Assessment (PA)?

- To review information to determine if there had been a release or threat of release related to AEC operations (Reference CERCLA Section 101 (22)).

Reviewers?

- IAAAP, Corps of Engineers, DOE, Operations Support Command (OSC), Environmental Protection Agency (EPA) and IDPH provided comments on the draft document - The Corps incorporated applicable comments.

Consider new information?

- As information became available, it was assessed. For example, throughout the PA process, the DOE has declassified documents pertinent to identifying radioactive contamination at the IAAAP.
- The Corps will consider any additional evidence of AEC contamination as it becomes available and, if warranted, expand the area to be investigated under FUSRAP.



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Basis of Preliminary Assessment

- Reports, interviews, radiological survey's, photos, historical and present day data from the following agencies were evaluated.
 - Department of Defense
 - The U.S. Army
 - National Archives and Records Administration
 - The Library of Congress
 - The Atomic Energy Commission / The Department of Energy The Department of Agriculture
 - The Department of the Interior
 - The State of Iowa
 - Local
- Additionally, 19 interviews with former workers were conducted, two site visits were made and a limited radiological survey of Firing Sites 6 & 12 was performed.

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- **Department of Defense** - National Imagery & Mapping Agency, Scientific & Technical Information Library System, the Defense Supply Center & the Defense Technical Information Center
- **The U.S. Army** - IAAAP, St. Louis & Omaha District Corps of Engineers, the Installation Operations Command Historical Office, the Rock Island Arsenal Museum, the U.S. Army Chemical School, the U.S. Army Military History Institute & Photo Archives, the U.S. Army Technical Center for Explosives Safety & the Corps of Engineers Office of History
- **National Archives and Records Administration** - Archives I & II & NARA Regional Offices in Kansas City & Chicago, the National Personnel & Washington National Records Centers
- **The Library of Congress**
- **The Atomic Energy Commission / The Department of Energy** - DOE Albuquerque, NM office
- **The Department of Agriculture** - Iowa State Office, USDA Ft. Madison Service Center, USDA Aerial Photography Field Office & USDA Farm Service Agency in West Burlington
- **The Department of the Interior** - U.S. Geological Survey & U.S. Fish & Wildlife
- **The State of Iowa** - Iowa Department of Public Health, State Historical Society & the University of Iowa
- **Local** - The Burlington Public Library & site related personnel (Former Worker Program)



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Conclusions of Preliminary Assessment

- The Preliminary Assessment found evidence of a CERCLA release related to AEC and identified potentially impacted areas.
- The Preliminary Assessment recommended further investigation and the project was included in FUSRAP in July 2002.

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Finding?

- evidence of release of AEC related hazardous materials

Conclusion?

- contamination from AEC activities exists at Firing Sites 12 and 6 and may exist at Line 1, the Explosives Disposal Area, the Inert Disposal Area, Storage Yards C, G, and L, the North Burn Pads Landfill, the Deactivation Furnace and a Line 3 Warehouse.

Recommendation?

- further investigation to determine the nature and extent of AEC associated contamination to support cleanup is warranted.
- any additional evidence of AEC contamination will be considered as it becomes available and, if warranted, expand the area to be investigated under FUSRAP.

Designation?

- July 2002.



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What's Next?

- **Goal:** ensure protection of human health and the environment by remediating the FUSRAP site at the IAAAP in accordance with the CERCLA / NCP process in an expeditious manner.
- **Next step:** Remedial Investigation (RI)

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Purpose of the RI?

- To determine the nature and extent of contamination. A risk assessment is performed to determine the potential risk to human health and the environment from the contamination.



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Issues

- **Management Approach / Site Strategy**
 - Investigate areas identified
 - Continue stakeholder involvement
 - Avoid delays & duplication
 - Include “new” relevant information
 - Resolve issues & develop schedule
- **Meet with the IDPH and USEPA to discuss issues / approaches that the team can agree upon as a path forward**

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Approach?

- Investigate all areas identified as potentially impacted by the AEC for radiological contamination including Environmental Restoration, Account (ER,A) remediated areas
- Continue stakeholder involvement in FUSRAP process (Restoration Advisory Board)
- Avoid delays and duplication between FUSRAP and ER,A
- Include “new” relevant information in accordance with CERCLA

What needs to be resolved?

- Applicability of the existing Federal Facilities Agreement
- Applicability of existing Records of Decision
- Funding - The IAAAP is currently not in the FUSRAP Fiscal Year (FY) 2003 budget.
- Community Relations Plan
- Preliminary Remediation Goals
- Delineation of AEC impacted areas - examination of 1,600 acres under FUSRAP vs. 19,000 acres
- Other



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Site wide Survey

- Evaluated in accordance with CERCLA
- AEC active on 1,600 of 19,000 acres
- New information will be incorporated

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- The IAAAP was evaluated in accordance with the CERCLA process
- Evaluation of historical AEC activities indicates approximately 1,600 of the Plant's 19,000 acres may have been impacted
- New information will be incorporated as it becomes available.



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Radiological Flyover Survey

- Corps directed to report, in consultation with the State of Iowa, on its recommendations regarding a radiological survey of the entire site. (Senate Report 107-39)
- Corps conclusion- flyover is not well suited to answer specific questions about AEC contamination at the IAAAP.

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Conclusion?

“The flyover survey does not appear appropriate for the IAAAP. The limited amount of data gained from an aerial radiometric survey is not likely to be useful in identifying further areas for cleanup under the FUSRAP Program”

Rationale?

- It would not detect Depleted Uranium unless it was sizeable and located on the ground surface
- A flyover could not reach areas with manmade or natural obstructions such as water, trees, buildings or power lines.
- Several areas of the plant store depleted uranium and would “mask” our ability to delineate adjacent areas.



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Our Commitment

The Army Corps of Engineers is committed to expeditious identification and clean up of AEC contaminants at IAAAP, as appropriate under CERCLA.

We will work with the State, the EPA and the community to fulfill this commitment.