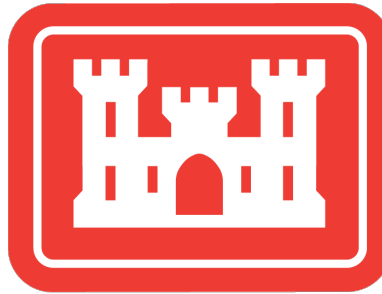


Final
Iowa Army Ammunition Plant
Community Relations Plan

for the
Remedial Action at Iowa Army Ammunition Plant, Operable Unit 5
Incendiary Disposal Area (IAAP-06-R-01), Possible Demolition Site (IAAP-
004-R-01), and Possible Demolition Site North Munitions Response Sites
Munitions Response Sites, Des Moines County, Iowa

Contract Number: W912DY20D0017
Task Order Number: W9128F22F0277

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May 2023



Summary of Changes

Revision	Date Submitted	Description and Location of Revision	Date Approved	Approved By
0	December 2022	Revised per 2 December 2022 comments from the U.S. Army Corps of Engineers		
1	May 2023	Revised per 12 April 2023 comments from the Environmental Protection Agency		



Community Relations Plan

Revision 1

Report Title: Remedial Action at Iowa Army Ammunition Plant, Operable Unit 5 Incendiary Disposal Area (IAAP-06-R-01), Possible Demolition Site (IAAP-004-R-01), and Possible Demolition Site-North MRSs, Des Moines County, Iowa

Site Number: IA7213820445

Client Name: U.S. Army Corps of Engineers, Omaha District

Contract Number: W912DY20D0017

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ACRONYMS AND ABBREVIATIONS

CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
DERP	Defense Environmental Restoration Program
DoD	U.S. Department of Defense
EPA	U.S. Environmental Protection Agency
IAAAP	Iowa Army Ammunition Plant
IDNR	Iowa Department of Natural Resources
IDPH	Iowa Department of Public Health
InDA	Incendiary Disposal Area
MEC	munitions and explosives of concern
mm	millimeter
MMRP	Military Munitions Response Program
MRS	Munitions Response Site
OU5	Operable Unit 5
PDS	Possible Demolition Site
RAB	Restoration Advisory Board
RDX	Royal Demolition Explosive (hexahydro-1,3,5-trinitro-1,3,5-triazine)
Three Rs	(Recognize, Retreat, Report) Explosives Safety Education Program
USACE	U.S. Army Corps of Engineers



1.0 Overview of Community Relations Plan

This Community Relations Plan provides a site overview and planned community interaction and outreach for the Iowa Army Ammunition Plant (IAAAP) Operable Unit 5 (OU5), Incendiary Disposal Area (InDA), Possible Demolition Site (PDS), and PDS-North Munitions Response Sites (MRS). PDS MRS (IAAAP-004-R-01) was divided into two separate MRSs: PDS from the northern edge of K-Road south, which retains the name PDS; and PDS from the northern edge of K-Road north, which is referred to as PDS-North. Figure 1.1 presents the location of these MRSs within IAAAP. USACE will use this Community Relations Plan to keep the community informed about the Remedial Action at OU5, InDA, PDS, and PDS-North MRSs.

This document is divided into the following sections:



- Section 2.0 – Site Description and History, which includes the site history; description of the InDA and PDS MRSs including location, size, and surroundings; and previous cleanup activities.
- Section 3.0 – Community Background, which includes a profile of the community population, key local issues and interests, history of community involvement, key community concerns and the USACE’s responses to these concerns.
- Section 4.0 – Describes the community involvement program, which USACE uses to discuss and address environmental restoration issues identified by the community.

Appendix A includes an overview of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process, which provides the framework for conducting environmental restoration efforts for Defense Environmental Restoration Program (DERP).

The community outreach activities for the selected IAAAP MRSs will include contractor participation in the Restoration Advisory Board (RAB) meetings and sharing the revised Proposed Plan and revised Record of Decision on the online information repository that houses the administrative record for IAAAP. All community relations activities are conducted under the oversight of the U.S. Army Corps of Engineers (USACE), Omaha District.

Figure 1 Site Location

Legend

-  Site Boundary
-  Iowa Army Ammunition Plant

Notes:
CRP=community relations plan
PDS=possible demolition site



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(01)Site_Location.mxd
12/16/2022 JM
Source: HGL, ArcGIS Imagery





2.0 Site Description and History

2.1 Site Information

IAAAP (U.S. Environmental Protection Agency [EPA] ID No. IA7213820445) is an approximately 19,000-acre site listed on the Superfund National Priorities List in 1990. The primary activity at IAAAP since 1941 has been to load, assemble, and pack a variety of conventional ammunition and fusing systems for the U.S. Department of Defense (DoD). IAAAP is an active Joint Munitions Command facility currently operated by the civilian contractor, American Ordnance LLC, operating under Resource Conservation and Recovery Act and National Pollutant Discharge Elimination System permits. The U.S. Army is the lead agency for implementing the Remedial Action at IAAAP, which is funded by the Military Munitions Response Program (MMRP) within DERP. The USACE, Omaha District is executing this work on behalf of the U.S. Army.

IAAAP is in a rural area approximately 8 miles west of Burlington in Des Moines County, Iowa, and approximately 9 miles northwest of the Skunk and Mississippi Rivers. Approximately one-third of the IAAAP property is occupied by active or formerly active production or storage facilities. The remaining land is either woodlands or property leased for agricultural usage.

Two MRSs within the IAAAP boundaries, described below, are the subject of this Community Relations Plan.

2.1.1 Incendiary Disposal Area (IAAP-006-R-01)

The InDA MRS is located north of K Road, near the east boundary of IAAAP, and covers approximately 34 acres. InDA was reportedly used as a high explosives demolition area and/or for burial of unknown materials. Historical drawings indicate that InDA was small (approximately 40 feet by 60 feet) and surrounded by a barbed wire fence; however, through various investigations, the boundary has expanded to the current 34 acres (USACE, 2013).

Four munitions and explosives of concern (MEC) items were recovered on the surface of InDA and 17 MEC items were recovered from the subsurface. MEC included 19, 75-millimeter (mm) projectiles and two M1A1 mines. Munitions debris from these and other munitions were also recovered. MEC items recovered from InDA during the intrusive investigation were in the shallow surface soil. The depths, types, and conditions of items (i.e., unfuzed and unfired) is consistent with historical accounts that InDA was a munitions demolition area (USACE, 2013).

Surface and subsurface soil samples were collected and analyzed for munitions constituents. No chemicals were detected above human health screening criteria. Lead and mercury were detected at concentrations that exceeded ecological risk screening criteria in surface soil (0 to 0.5 feet below ground surface) in two distinct areas in the west-central and south-central portions of the InDA MRS. No munitions constituents were detected above ecological screening criteria in subsurface soil. No groundwater sampling has been performed at InDA because no munitions constituents were detected in subsurface soil above screening criteria (USACE, 2013).



As a result of the 2006 EPA dispute resolution, fencing was installed around the perimeter of the MRS in 2012 (USACE, 2013). The Feasibility Study was initially finalized in February 2012, with an amendment finalized in March 2013, and recommended MEC Alternative 2 for the InDA MRS. Under MEC Alternative 2, implementation of administrative controls and operations and maintenance of fencing and signage was required. The Record of Decision finalized in September 2014 selected remedy MEC Alternative 2 for land use controls for the InDA and PDS MRSs. The Federal Facilities Agreement and 2006 dispute resolution has guided the investigation and fencing action at InDA with no other CERCLA enforcement activities.

2.1.2 Possible Demolition Site (IAAP-004-R-01)

The PDS MRS is in the south-central portion of IAAAP and covers approximately 35 acres. During the Remedial Investigation, the area was expanded to the north of K Road (USACE, 2011b). PDS was not identified as an active U.S. Army MMRP site in the *Closed, Transferring, and Transferred Range/Site Inventory* (USACE, 2003). During the 1940s and early 1950s, PDS may have been used as a demolition area for ammunition items and for demilitarizing white phosphorus rounds. During the Remedial Investigation, eight MEC items and 307 munitions debris items, including fuzes and an M5A1 cartridge, pieces of M1A1 mines, 81mm mortars, and 75mm projectiles were recovered at PDS (USACE, 2013).

Surface soil, subsurface soil, and groundwater samples were collected and analyzed for explosive compounds and certain metals associated with munitions. No explosives were detected above screening criteria in soil except for RDX in one location at a depth of 0.5 to 2 feet below ground. The soil sample had an RDX concentration of 14 milligrams per kilogram, exceeding the 1.3 milligram per kilogram Remedial Goal for the protection of groundwater. The sample location was adjacent to a fuze component, which was likely the source of the RDX. Copper and mercury were detected above ecological screening criteria in surface soil but were not found to pose unacceptable ecological risks in the risk assessment (USACE, 2013).

A perimeter fence was installed around the expanded PDS MRS in 2012 to comply with the 2006 EPA dispute resolution (USACE, 2013). The Feasibility Study was initially finalized in February 2012, with an amendment finalized in March 2013 that did not pertain to PDS but recommended MEC Alternative 2 for the InDA MRS. Under MEC Alternative 2, implementation of administrative controls and operations and maintenance of fencing and signage was required. The Record of Decision finalized in September 2014 selected remedy MEC Alternative 2 for land use controls for the InDA and PDS MRSs. The Federal Facilities Agreement and 2006 EPA dispute resolution have guided the investigation and fencing action at PDS with no other CERCLA enforcement activities. Access to the PDS MRS is restricted by land use controls (Na Ali'i Consulting & Sales, LLC, 2022).

2.1.3 Planned Environmental Restoration Activities

The overall objective of the Remedial Action planned at the InDA, PDS, and PDS-North MRSs is to reduce explosives safety hazards to human and ecological receptors by removing MEC.



2.1.4 Nature of Threat and Potential Threat to Public Health, Safety, and the Environment

IAAAP manages the InDA, PDS, and PDS-North MRSs covered by this Community Relations Plan under administrative and engineering controls (fencing and signage) to limit access to the sites. Each of the three sites has confirmed presence of explosives hazards in the form of MEC and munitions debris. The MRSs are all located within secured IAAAP boundaries and are not open to the public. Therefore, the present threat to public health and safety is minimal. There is no existing munitions constituents contamination at the InDA, PDS, or PDS-North MRSs.

The planned path forward for the InDA, PDS, and PDS-North MRSs is to amend the Proposed Plan to select new remedial alternatives to achieve unlimited use/unlimited exposure through identification and removal of MEC and munitions debris present at these MRSs.

2.1.5 Responsible Lead Agency/Roles and Responsibilities

IAAAP holds lead responsibility for developing, maintaining, and updating the installation's community relations program, including this Community Relations Plan, with support from USACE. These activities are typically coordinated through the IAAAP Public Affairs Office, with support from the Joint Munitions Command Public Affairs Teams. Activities include, but are not limited to, website updates, public programs, presentations, and production of materials for distribution.

EPA provides technical and non-technical review of press releases referencing Federal Facility Agreement activities that are intended for public information. EPA reviews this material for technical content, factual accuracy, and concurrence with EPA-established community relations guidelines. EPA monitors and ensures IAAAP's compliance with federal regulatory requirements. EPA also is a member of the IAAAP RAB.

The Iowa Department of Natural Resources (IDNR) is a limited partner in IAAAP environmental restoration activities. They receive copies of all draft documents for comment and their files. The IDNR is a member of the IAAAP RAB.

The Iowa Department of Public Health (IDPH) may review some materials intended for public information from a public health standpoint. IDPH may also assist in the development of activities and/or materials for the community to ensure appropriateness for the intended audience and cohesiveness with other community health-based issues.

The surrounding communities provide the focus and direction of IAAAP's community relations program through input during public meetings, public comment periods, RAB meetings, through correspondence, and through local officials. Program organization is intended to channel this input into a community relations program that will best serve the needs and concerns of the surrounding communities.



At the request of the U.S. Army, USACE will implement the remediation efforts at the InDA, PDS, and PDS-North MRSs. IAAAP maintains the lead responsibility for maintaining the Community Relations Plan, with support from USACE.



3.0 Community Background

In 2020, the U.S. Census Bureau estimated the population of Des Moines County at 39,227 and Burlington's population at 24,858. The 2020 U.S. census population of Middletown was 447. Additional communities near IAAAP and their 2020 U.S. census populations include, to the east, West Burlington population of 2,909; to the northeast, Mediapolis population of 2,118; and to the northwest, Danville population of 931 and New London population of 2,433. To the south, the small unincorporated communities of Augusta, Middletown, Danville, Weaver, and Augusta are primarily rural communities, with IAAAP being the second largest source of employment. Incorporated towns are governed by council/manager or council/mayor structures (U.S. Census Bureau, 2022).

Residents of Middletown, Danville, New London, Mt. Pleasant, West Burlington, and Burlington dominate IAAAP's work force. Some workers commute to IAAAP from Illinois and Missouri. Due to its continuity of operations and consistently large payroll, the site has developed support from many business and community leaders. Also, because it has been operational since World War II, numerous current and former workers residing in local communities have developed and maintained loyalty and identification with the installation.

Des Moines County's industrial base centers in diversified manufacturing that includes production of antenna systems, batteries, cattle and hog feeders, safety paper, chemicals, cleansing compounds, ethanol, desks, gypsum, electronic instruments and components, furniture, medium voltage switchgear, mattresses, millwork, oil, lubricants, paint, paper boxes, printing, spark plugs, industrial tractors, turbines, burial vaults, and potato chips. Regional agricultural crops include corn, soybeans, and pasture grasses. Beef, dairy cattle, hogs, and poultry also are raised on area farms (Greater Burlington Partnership, 2022).

3.1 History of Community Involvement

Historically, IAAAP's community relations activities related to environmental restoration were limited, until 1989 when the installation's initial Public Involvement and Response Plan was in development. The final version of the initial Community Relations Plan for Iowa Army Ammunition Plant (Public Involvement and Response Plan) was released in 1991. Past community relations activities have included:

- The initial Community Relations Plan for Iowa Army Ammunition Plant (Public Involvement and Response Plan) was finalized in 1991 for the USACE Toxic and Hazardous Materials Agency out of Aberdeen Proving Grounds, Maryland.
- RAB formed in 1997 to provide input into ongoing environmental restoration projects, and to satisfy regulatory requirements.
- Tours of IAAAP cleanup sites for local high school science classes and Earth Day Public Tours of the installation.
- Public survey conducted in 2000.
- Establishment and continued maintenance of the online information repository that houses the IAAAP administrative record at <https://iaaprestoration.com/adminrecord/>.



- Update of the Community Relations Plan in February 2001, September 2011, August 2022, and October 2022.
- Public notice in *The Hawk Eye* dated November 29, 2007, to announce the intent to apply the Munitions Response Site Prioritization Protocol to IAAAP MMRP sites, including the InDA and PDS South of K-Road MRSs. The protocol is used to prioritize response activities at MRSs, taking into consideration various factors related to safety and environmental hazards.

U.S. Army staff plans IAAAP community relations activities and receive support from the Joint Munitions Command Public Affairs Office, Army Environmental Command environmental office, and USACE. The activities described above all pertain to environmental cleanup at IAAAP, not just OU5, and are for on-site personnel and residents of the local communities.

3.2 Key Community Concerns

Based on review of RAB meeting minutes on the online information repository that houses the IAAAP administrative record, community concerns regarding the OU5 MRSs covered by this Community Relations Plan have been minimal (IAAAP, 2022).

3.3 Response to Community Concerns

IAAAP and USACE will continue to provide OU5 updates at the RAB meetings to address community concerns.

3.4 Summary of Communication Needs

IAAAP and USACE will continue to provide briefings of activities related to the InDA, PDS, and PDS-North MRSs, at the RAB meetings and will place final reports into the IAAAP administrative record, including this Community Relations Plan, the revised Proposed Plan, and revised Record of Decision.



4.0 Community Relations Program

Community participation is an important aspect of the restoration of a site. Only through the combined efforts of the surrounding communities, state and federal agencies, IAAAP, and USACE can effective restoration plans be identified and implemented. The IAAAP's community relations program includes objectives and strategies that are responsive to public input and issues and concerns that were described in the 2011 Community Relations Plan Update (USACE, 2011a). The strategies are:

- 1) Maintain open lines of communication with the surrounding communities on environmental issues;
- 2) Inform and educate the surrounding communities and local public officials about environmental cleanup activities as they occur; and
- 3) Solicit input from the surrounding communities on environmental restoration efforts.

4.1 Communication Goals

The USACE objectives for each strategy of IAAAP's community relations program are as follows:

Strategy 1: Maintain open lines of communication with the surrounding communities on environmental issues.

Objective 1A: Facilitate two-way communication among the surrounding communities and IAAAP on environmental issues. All written materials will emphasize the various avenues for community members to easily receive information, have questions answered, or convey comments. Public notices will be provided to the local newspapers. Technical information will be explained as clearly and concisely as possible to increase the public's understanding of U.S. Army's DERP and the EPA Superfund Program. Organized opportunities for the public to comment on IAAAP's presentation materials, programs, and/or events will be publicized. Community input and inquiry are encouraged at any time via telephone, written correspondence, or approved visits to IAAAP. Efforts to maintain open two-way communications are part of the IAAAP plan to make the surrounding communities' active partners with IAAAP in the restoration process. In addition, IAAAP has an active RAB. The RAB is a citizen-based advisory group that provides input that the installation needs for community-based decision-making and is responsive to community needs and concerns. The RAB is also charged with the responsibility of passing information about environmental restoration to the community it represents.

Objective 1B: Maintain communication with local officials and environmental interest groups. Members of local governments are valuable contacts for both the citizens of Des Moines County and IAAAP. The cooperation between local officials and IAAAP is necessary to ensure a harmonious working relationship and a reliable flow of information. Local officials will be on the environmental mailing list, invited to RAB meetings and open houses, and will be given information/tours upon request. IAAAP will communicate regularly with environmental interest group representatives interested in protecting the community.



Objective 1C: Provide information to surrounding communities about potential impacts on human health or the environment. IAAAP will inform surrounding communities of public health issues and environmental issues when information becomes available through field investigation or other processes.

Strategy 2: Inform and educate the surrounding communities and local public officials about environmental cleanup activities as they occur.

Objective 2A: Educate the surrounding communities about the CERCLA process and the U.S. Army's cleanup initiatives (Appendix A). Information will be readily provided on the CERCLA process and the U.S. Army's cleanup initiatives as requested or required. In addition, the surrounding communities will be given information about past remediation/restoration activities and the reasoning behind finishing or closing cleanup sites including maps, schedules, and test results; the investigation and restoration of each of the MRSs; and how these activities fit into IAAAP's overall cleanup efforts. This will include sufficient detail that citizens do not develop unreasonable expectations about the timing or scope of environmental cleanup plans.

Strategy 3: Solicit input from the surrounding communities on environmental restoration efforts.

Objective 3A: Provide a forum for citizens' input into cleanup activities at IAAAP. Community input and participation is an important aspect of successful site restoration. IAAAP's RAB is a citizen-based advisory group that provides the input to the installation or community-based decision-making that will be responsive to community needs and concerns. Progress reports on corrective action processes and technical support to the RAB are key factors in promoting informed and valuable reviews and comments from this group. RAB meetings are open to the public and a public comment/question period is on each agenda.

4.2 Communication Methods and Techniques

Communication methods employed to keep the community informed about the progress at the MRSs covered by this Community Relations Plan are listed in the following sections.

4.2.1 Restoration Advisory Board

The IAAAP Army staff and USACE will support the IAAAP RAB. USACE support will consist of providing updates about the progress and schedule of the Remedial Action at InDA, PDS, and PDS-North MRSs during RAB meetings. An active RAB exists at IAAAP and is comprised of an IAAAP co-chair, a community co-chair, representatives of the IDNR, EPA, and interested community members. The RAB was formed using DoD RAB guidelines and community input and will recruit new members periodically to ensure a diverse community representation. RAB meetings are open to the community and will be announced in a timely manner to the public through local newspapers. The RAB functions in an advisory capacity to IAAAP, which provides financial, administrative, and leadership support (IAAAP co-chair) to the RAB. RAB meeting minutes will be posted on the online information repository that houses the administrative record for IAAAP. These community involvement activities support Objectives 1A, 1B, and 3A.



4.2.2 Public Meetings

USACE will revise the Proposed Plan for the InDA, PDS, and PDS-North MRSs and will provide the public an opportunity to comment on the revised Proposed Plan. USACE will hold a public meeting during the public comment period to provide an update on the project and an overview of the revised Proposed Plan to ensure the public has an opportunity to ask questions and provide comments prior to revising the Record of Decision for the MRSs. Public meeting minutes will be posted on the online information repository that houses the administrative record for IAAAP. These community involvement activities support Objectives 1A, 1B, and 2A.

4.2.3 News Releases

The IAAAP Army staff will send news releases to local media, as appropriate, to ensure that the general public receives the results of site activities, notification of upcoming meetings and public comment periods, and other site-related information. News releases and public service announcements also will be posted on the online information repository that houses the administrative record for IAAAP, published in local newspapers, announced on the local radio stations, and sent to the members of the RAB. These community involvement activities support Objectives 1A, 1B, 1C, and 2A.

4.2.4 Public Notices

CERCLA requires public notices to inform the community of the release of relevant documents and the timing of the public comment period. These notices ensure that the community has a chance to voice its opinions and concerns. Public notices also announce RAB and public meetings. USACE will publish a public notice announcing the availability of the revised Proposed Plan for public review and comment in the online information repository that houses the administrative record for IAAAP. The public notice also will specify the dates for the public comment period and the associated public meeting. Additionally, when the revised Record of Decision is finalized and uploaded to the online information repository, USACE will publish a public notice announcing the availability of the revised Record of Decision.

4.2.5 Administrative Record

The IAAAP Army staff will maintain an information repository online. IAAAP has established the administrative record at <https://iaaprestoration.com/adminrecord/>,_OU 5, which includes the InDA, PDS, and PDS-North MRSs. This system provides the community access to information regarding the installation and environmental cleanup activities. It also allows the public to stay informed of site findings. Documents related to site work, along with RAB and other public meeting minutes, are in the online information repository that houses the administrative record. These community involvement activities support Objectives 1B, 1C, and 2A.



4.2.6 Planning Meetings

USACE will hold planning meetings periodically during the Remedial Action to provide regulatory agencies and stakeholders, including IAAAP Army staff, an opportunity to be involved in the Remedial Action process. The objectives of the planning meetings are to:

- Involve a multi-disciplinary project planning team to develop project-specific data quality objectives,
- Achieve stakeholder acceptance of the data quality objectives, and
- Discuss results of Remedial Action efforts.

USACE will distribute an agenda and meeting materials in advance of the planning meetings. These community involvement activities support Objectives 1A and 1B.

4.3 Three Rs (Recognize, Retreat, Report) Communication

The Three Rs (**Recognize, Retreat, Report**) of Explosives Safety will be integrated into public information distributed for IAAAP to ensure consistent explosives safety messaging across U.S. Army installations. At a minimum, the following Three Rs logo and text will be included on all printed community involvement materials such as news releases and public notices:



Recognize – when you may have encountered a munition and that munitions are dangerous.

Retreat – do not approach, touch, move or disturb it, but carefully leave the area.

Report – call 911 and advise the police of what you saw and where you saw it.

Information about the Three Rs may be disseminated at RAB and public meetings to reinforce the U.S. Army's Three Rs Explosives Safety Education Program. Supporting public resources can be found online at the U.S. Army's Three Rs of Explosives Safety Education Program website at <https://3rs.mil>.

4.4 Planned Community Involvement Activities

Community involvement activities that relate to the Remedial Action at the InDA, PDS, and PDS-North MRSs are detailed in Table 4.1 below. The dates are subject to change.



**Table 4.1
Planned Community Involvement Activities**

Community Involvement Activity	When	How
2023 RAB Meeting 1	June 2023	In-person meeting
Planning Meeting 1	August 2023	In-person with regulators and stakeholders with virtual option on Microsoft® Teams and teleconference option
Revised Proposed Plan Public Notice for Public Meeting and Public Comment Period Proposed Plan Public Meeting Public Meeting Minutes	September-October 2023	Revised Proposed Plan for public review and comment and public meeting minutes will be uploaded to the online information repository housing the administrative record for IAAAP; public meeting to provide community opportunity to comment on Revised Proposed Plan
2023 RAB Meeting 2	October 2023	In-person meeting
Community Relations Plan	June 2023	Community Relations Plan will be uploaded to the online information repository housing the administrative record for IAAAP
Planning Meeting 2	April 2024	In-person with regulators and stakeholders with virtual option on Microsoft® Teams and teleconference option
2024 RAB Meeting 3	May 2024	In-person meeting
2024 RAB Meeting 4	July 2024	In-person meeting
Planning Meeting 3	August 2024	In-person with regulators and stakeholders with virtual option on Microsoft® Teams and teleconference option
2024 RAB Meeting 5	October 2024	In-person meeting
Revised Record of Decision	January 2025	Revised Record of Decision will be uploaded to the online information repository housing the administrative record for IAAAP
2025 RAB Meeting 6	January 2025	In-person meeting
2025 RAB Meeting 7	April 2025	In-person meeting
2025 RAB Meeting 8	October 2025	In-person meeting
2026 RAB Meeting 9	May 2026	In-person meeting
2026 RAB Meeting 10	November 2026	In-person meeting
2027 RAB Meeting 11	May 2027	In-person meeting

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APPENDIX A
CERCLA PROCESS

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Hazardous Waste Site Cleanup Laws and Regulations

“Superfund” is the common name for the federal law that governs cleanup of hazardous waste sites. The law was created in 1980 as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and was later amended in 1986 by the Superfund Amendments and Reauthorization Act. CERCLA is implemented by the National Oil and Hazardous Substances Pollution Contingency Plan.

The U.S. Department of Defense (DoD) established the Military Munitions Response Program (MMRP) in 2001 to address munitions related concerns, including explosives safety, environmental and health hazards from releases of unexploded ordnance, discarded military munitions, and munitions constituents on non-operational range land. Contamination of the property must have occurred prior to 2002 and the sites must not be included in an active Installation Restoration Program site. The OU5 MRSs at IAAAP are eligible sites under the MMRP.

The goals of the MMRP are to reduce the risk to human health and the environment of hazardous waste sites through the implementation of effective, legally compliant, and cost-effective cleanup actions, and to implement final remedies when the situation warrants.

The MMRP follows the CERCLA remedial and removal processes described below and illustrated on Figure A.1.

CERCLA Remedial Response Process

Remedial Actions are generally long-term response actions that permanently and significantly reduce the risks associated with releases or threats of releases of hazardous substances. Remedial Actions may be incorporated throughout the time frame of the response action.

Preliminary Assessment/Site Inspection: During the Preliminary Assessment, the U.S. Army Corps of Engineers (USACE) collects available property information to evaluate threats to public health or the environment. A property visit may be completed. Findings of the Preliminary Assessment are presented in an Inventory Project Report, which provides information on the pathways of exposure, exposure targets, and source and nature of release. If necessary, USACE will conduct a Site Inspection to confirm data collected in the Preliminary Assessment, collect additional site-specific data, and perform limited environmental investigations to confirm the presence or absence of military munitions or munitions constituents. For MMRP Site Inspections, potential explosive hazards are evaluated to prioritize response actions. The purpose of the Site Inspection is to augment the data collected in the Preliminary Assessment and to generate, if necessary, sampling, and other field data to determine if further action or investigation is appropriate.

Remedial Investigation/Feasibility Study: USACE conducts a Remedial Investigation to characterize the nature and threat posed by the military munitions identified during the Site Inspection and gather data necessary to assess the extent of the threat to human health, safety, or



the environment. Next, USACE conducts a Feasibility Study to ensure that appropriate cleanup alternatives are developed and evaluated.

Proposed Plan and Record of Decision/Decision Document: USACE begins the remedy selection process with the preparation of a Proposed Plan. The Proposed Plan summarizes the cleanup alternatives evaluated in the Feasibility Study and identifies the preferred cleanup method. Public comment on the proposed remedy is evaluated prior to preparing a Record of Decision (for National Priority List projects under the U.S. Environmental Protection Agency) or Decision Document (for non-National Priority List projects under DoD) that specifies the final cleanup remedy.

Remedial Design/Remedial Action: USACE designs and develops engineering, safety, and contract documents for the selected Remedial Action and implements it. The Remedial Action is the long-term cleanup action selected for the site.

Response Complete/Project Closeout: USACE may provide monitoring or long-term management of the RA to ensure the action is operating to meet its cleanup objective and remains protective of human health and the environment. Once cleanup objectives are met, a closeout decision is made in consultation with regulatory agencies and the public. A project closeout report documents the closure decision.

Figure A.1
CERCLA Process

