

Final Meeting Minutes
Restoration Advisory Board (RAB) Meeting
Sunflower Army Ammunition Plant (SFAAP)
Wednesday, November 14, 2001

1. The twenty-third RAB meeting was held on Wednesday, November 14, 2001, at SFAAP.
2. Copies of the agenda and sign-in sheet are attached.
3. Mr. Tony Spaar, the new Commander Representative at SFAAP, called the meeting to order at approximately 6:00 pm. Introductions were made around the room.
4. Mr. Spaar then asked for comments regarding the draft minutes from the September meeting. A motion was made and seconded to accept the minutes as written. The motion passed.
5. Mr. Spaar then asked for a discussion of the results of the review of the meeting attendance records. Mr. Spaar announced that RAB members who had missed more than 25% of the RAB meetings or three consecutive RAB meetings within the past year may be considered for dismissal. Mr. Spaar announced that Mr. James Bush had resigned. After discussion regarding how to handle the vacancies, it was decided to handle all vacancies at once. Next followed a lengthy discussion regarding who the voting and non-voting members are. The statement,

Individuals who have a conflict of interest shall not participate on the RAB. A conflict of interest is defined as: standing to make a direct personal financial gain or to gain an unfair competitive edge resulting from decisions made in the area of environmental restoration, decontamination or any working process under the control of the RAB.

was read from the RAB Operating and Procedure Policies in the RAB notebook. Mr. Jim Oyler did not think Mr. Milton Bland with Spec-Pro should be a voting member, since he is a contractor and his company benefits from work at SFAAP. It was stated that the regulators' responsibilities were to serve as an information, referral, and resource bank, to review documents, to ensure that state and federal environmental standards and regulations are identified and addressed, to facilitate flexible and innovative resolutions of environmental issues and concerns, and to assist in education and training for the RAB members, but the book (RAB Operating and Procedure Policies) states nothing about whether or not they vote. Mr. Oyler stated that we (the RAB) had agreed that they would not vote. It was asked whether or not Mr. Spaar could vote. It was stated that there hadn't been a close vote before, so it hadn't been an issue. Mr. Bill Maasen stated that Co-Chairs shouldn't vote unless there is a tie; therefore, if Mr. Spaar doesn't vote, Mr. Maasen will decide all ties. It was unofficially decided that Federal employees (including Mr. Spaar) and Mr. Bland

would not vote. The attendance records were then examined, and it was determined that Mr. Richard Brazukas, Mr. Merle Couch, Mr. Alan Stevens, and Mr. Eugene Tinberg had exceeded the acceptable number of absences and could be considered for removal from the RAB. Mr. Brazukas stated that although he had a number of absences, he was still interested in remaining on the RAB. Mr. Maasen announced that if anyone disagreed with keeping Mr. Brazukas on the RAB, to so move. No motions were made. There was discussion regarding whether or not to keep Mr. Stevens on the RAB so as to have K-State representation. It was decided that he should be removed, but a notice would be sent to K-State and to K-State employees on the Plant requesting that an interested party apply for one of the vacancies. A motion was made, seconded, and later passed to remove Mr. Couch, Mr. Stevens, and Mr. Tinberg from the RAB. Therefore, there are five vacancies on the RAB (those vacated by Ms. Johnna Lingle, Mr. Bush, Mr. Couch, Mr. Stevens, and Mr. Tinberg). After some discussion, it was determined that Ms. Susie Wolf had not been sent the interest form for her application to the RAB. Ms. Katie Hopkins requested that an announcement of the vacancies be placed in the local newspapers. Ms. Micheline Burger read from the RAB Operating and Procedure Policies in the RAB notebook:

As deemed necessary, a RAB community member vacancy position shall be made known to the general public through all information outlets as soon as vacated. These outlets may include commercial media, libraries, schools, city councils, electronic media, direct mail, and any others as determined beneficial.

Mr. Oyler requested that previous applicants be made aware of the vacancies and asked to apply. Ms. Hopkins asked what qualifications they should look for in an applicant. Mr. Herstowski stated that technical expertise should be a consideration, but they should look for someone that could be an outsource of information for the RAB. Ms. Burger requested that an announcement of the vacancies also be provided to libraries. Someone asked where they could get a copy of the interest form. Mr. Spaar stated that he will have them.

6. Mr. Oyler was then asked to give a brief synopsis of the IAP meeting. He stated that SFAAP now has 67 SWMUs and 20 AOCs. He stated that there are now plans and funding to sample Captain's Creek, Kill Creek, and Spoon Creek. Mr. Oyler requested that the constrained budget be sent to the RAB members before the next meeting. Mr. Oyler stated that he did not like the fact that the 42-acre trash dump that will only be fenced. He would also like for the RAB to push to see that the sites along the Western side of the Plant that have contaminants seeping into Captian's Creek, be cleaned up. Mr. Oyler then moved that the Corps of Engineers and the Army prioritize the cleanup of SWMUs 21 and 22. Mr. Spaar stated that the Army was planning on doing an interim remedial action and reduce the potential for further contamination at SWMUs 21 and 22 right away. Mr. Oyler unofficially withdrew his motion.

Mr. Oyler stated that the IAP doesn't include money for burning the remaining buildings, removing the foundations, removing the asbestos-covered steam lines, removing the 50,000 feet of sewer lines that are contaminated with explosives, dismantling of the nitroguanidine plant, or cleaning up the wastewater treatment plant area. Mr. Spaar explained that DERA cannot use their money to clean up these types of projects. However, these items are in the Army's budget, but not in the IAP.

Mr. Oyler further explained that there were four contractors currently doing work at SFAAP. IT Corporation was doing cleanup work. Burns & McDonnell and ECC are finishing the Grazing Study and doing long-term monitoring. Spec-Pro is providing maintenance and security. Tetra Tech and GeoMarine are doing historical preservation. Mr. Oyler stated that he wants to have the latitude and longitude of the SWMUs on a CD-ROM so they can be lined up with a GPS map. Mr. Spaar stated that GSA is currently doing this. Mr. Maasen stated that the process of evaluating the historical properties on site is currently underway, but the evaluation will not be complete until June. Mr. Maasen offered to provide more information on this work if requested.

Mr. Oyler complemented Mr. Spaar, Ms. Meier, Mr. Herstowski, Mr. Carlson, Mr. Tim Davis, and Mr. Bland on their efforts at SFAAP. Mr. Spaar explained that the IAP will be published around the first of the year. The estimated cost to complete is now \$56.4 million. It is estimated that another \$20 million will be needed to finish the sewers, pipes, asbestos, the building burnings, and the cleanup of the explosives under the buildings, which was estimated to take approximately five years to complete when Oz was still under consideration. Mr. Spaar explained that although there are plans for these non-IRP projects to be completed, at this time, there isn't sufficient funding. Mr. Spaar stated that some of the funds that are normally available to Sunflower have been pulled and reallocated to other projects. The question was asked if political support was needed to bring those funds back to Sunflower. Mr. Maasen stated that government employees are not allowed to answer that type of question. As an individual, Mr. Maasen encouraged the community to voice their concerns and opinions. Mr. Spaar again reiterated the RAB's purpose is to respond to IRP issues and that this is outside of the realm of what is to be discussed at the RAB. Mr. Dean Palos asked if the \$56.4 million figure replaced the \$30 million figure. Mr. Spaar said that it did.

7. Ms. Meier introduced Mr. Keith Walker with IT Corporation. Mr. Walker provided a handout which was discussed detailing IT Corporation's work at Sunflower. A copy of his handout is attached to the minutes, rather than discussed in the body of the minutes (attachment 1).
8. Ms. Meier introduced Ms. Diana Marquez with Burns & McDonnell. Ms. Marquez provided a brief synopsis of the Grazing Study and discussed the final results. In response to a request by Ms. Hopkins, Ms. Marquez' presentation has been typed and is attached to the minutes, rather than discussed in the body of the minutes (attachment 2).

Following Ms. Marquez' presentation, questions were answered. Mr. Ron West asked what dioxin is and where it comes from. Ms. Marquez stated that dioxins are produced as a result of burning almost anything containing chlorine, such as chlorinated solvents, PCBs, PVC, etc. Mr. West asked what the ranges of PAHs were. Ms. Marquez said that they were low. Mr. Maasen asked what PAHs were. Ms. Marquez stated that PAH stands for polycyclic aromatic hydrocarbons and that they are combustible semivolatiles. Mr. Herstowski explained that chemicals are often grouped based on their boiling point. For example, compounds that have a boiling point less than 120 °C are grouped into volatile organic compounds. Those compounds that have a boiling point greater than 120 °C are grouped into semivolatile organic compounds. Ms. Burger asked if the conclusion of the Grazing Study was in the Public Health Assessment. Ms. Marquez stated that it was not. The question was then asked if the results of the Grazing Study would be added to the Public Health Assessment. Mr. Benjamin Puesta with ATSDR stated that it will be and requested to get together with Ms. Marquez following the RAB meeting. Mr. Oyler asked, "When the SWMUs are opened, will the area need to be resampled?" Ms. Meier stated that cattle cannot get into SWMUs 18, 19, 21, and 22. Once SWMUs 18 and 19 are capped, the fences can be removed. Mr. Oyler asked if there would be a deed restriction placed on the property. Ms. Meier stated that there will be a deed restriction against excavation. Mr. West asked about possibly testing areas of the Plant using the same method used to determine how much fertilizer is needed. Ms. Meier stated that there is a program – GPS – the Global Positioning System, that can be used to determine the sampling points. Mr. Herstowski stated that GPS has been used at Sunflower. Ms. Meier stated that the report should be finalized by the middle to the end of December.

9. Mr. Puesta with ATSDR announced that the Public Health Assessment is available for public comment. The deadline for the original 30-day public comment period was extended through November 27. Mr. Puesta encouraged RAB members to call him at 913-551-1312 if they have any questions, and individuals may either submit comments to him via email at bxp0@cdc.gov or directly to the Atlanta office at the ATSDR Headquarters at 1600 Clifton Road N.E., Mailstop E56, Atlanta, Georgia 30333.

Ms. Burger stated that in regard to the Public Health Assessment, she believes that it is the RAB's responsibility to review documents and relay their content to the community. Ms. Burger stated that she has asked several members of the community to attend this RAB meeting and provide their comments. Mr. Puesta stated he had received 20 comments this morning from Mr. Tom Pierce and will forward the comments on to Atlanta. Ms. Penny Seaverston spoke and later provided her comments in written form. Ms. Seaverston's comments are attached to the minutes, rather than in the body of the minutes (attachment 3).

Mr. Maasen stated that the RAB has no input into the burning plans. Mr. Spaar stated that no burns are scheduled. The Army would have to send out a RFP for a new contractor and obtain approval for the proposed burns from the regulators. Mr.

Bland stated that they had conducted air sampling in the initial pilot burns, but no asbestos was detected. Mr. Spaar stated that most of the remaining 200+ buildings have had the asbestos removed.

Ms. Burger then passed out a motion pertaining to comments to the ATSDR. Ms. Burger's motion is attached to the minutes, rather than in the body of the minutes (attachment 4). Mr. Herstowski explained EPA's risk assessment methods, which don't take into account individual risk – just excess cancer risk. Ms. Burger then read her motion, which was seconded (see attached). It was suggested that the words “and lead” be added to the last sentence, which now reads: “...regarding asbestos and lead leaving ...”. A correction was also suggested to change all of the references to “ATDSR” to “ATSDR”. Ms. Burger stated that she is not coming to any conclusions regarding the health effects, but that the Board should listen to the community members. Ms. Burger asked if the Public Health Assessment will be updated to include the results of the Grazing Study. Mr. Puesta stated that the Public Health Assessment will be updated based on the new information. Ms. Burger's motion, as amended, was passed by the RAB.

10. The discussion moved to new business. Mr. Oyler stated that there are 18 water wells with above ground with housing on top. They come across the river near the intake and are a health hazard because any well that can pump 1,000 gallons per minute can drink 2,000 gallons per minute and can pollute our water system. The casings on these wells are rusted and in need of repair. Mr. Oyler requests that the status of these wells be looked into before the next meeting.
11. The question was asked, “Since the number of SWMUs at SFAAP was expanded from 52 to 67, would this have had any effect on the Superfund analysis?” Mr. Herstowski stated that when the original Superfund analysis or HRS was completed, it had nothing to do with the number of SWMUs. The question was asked if it could be reevaluated due to the new SWMUs. Mr. Herstowski stated that the site was proposed for the NPL in 1995 and there were approximately 48 SWMUs in 1991. Mr. Maasen stated that he would like to have a map showing the new SWMUs.
12. Ms. Hopkins stated that she would like a written outline of future presentations.
13. The discussion moved to the next meeting date which should be January 2. It was agreed to move the date of the next meeting to January 9 at 6:00 pm. The next meeting will be at the old City Hall next to the Fire Station in DeSoto. Ms. Michelle Beckman agreed to provide a map to the new meeting location with the minutes from this meeting.
14. Items for the next meeting's agenda were then recapped to include the following:
 - Discussion of new members
 - LTO Update
 - Discussion of the status of the water wells

Mr. Davis requested that Mr. Oyler put his request for a water well status update in writing. Mr. Davis agreed to make a call to Mr. Scott Smith to retrieve the requested information. Ms. Meier stated that if these wells are not IRP-eligible, we may not be able to discuss them, but we can provide the requested information.

15. The meeting was adjourned at approximately 8:00 pm

**U.S. ARMY CORPS OF ENGINEERS
KANSAS CITY DISTRICT
TOTAL ENVIRONMENTAL RESTORATION CONTRACT
SUNFLOWER ARMY AMMUNITION PLANT**

SWMUs 2, 18, 32, 33, 34, AND 35

SWMU 2—River Water Treatment Lagoons

Background. SFAAP will be conducting sediment, surface soil and surface water sampling to collect additional inorganic (metals) characterization data to complete the RCRA Facility Investigation (RFI).

Current Status

IT has submitted Draft Field Sampling Work Plan to Army and Regulators in August. KDHE and Army have provided comments and the Army is preparing final submittal for late November. Collection of samples, validation of data and the RFI Addendum will be finalized by April 2002.

SWMU 18—Old Sanitary Landfill

Background. The Army is performing an interim removal action to repair the damaged SWMU 18 landfill vegetative cover. The cover has intermittent patches of exposed landfill debris/rubbish that has been exposed by surface runoff and potentially subsurface seeps.

Current Status

IT has submitted Draft Work Plan in August, and KDHE and the Army have provided comments. IT is preparing final submittal on behalf of the Army for late November. Field mobilization is anticipated for mid December. Fill to be used for cover repair will be obtained from the site, and will be chemically tested prior to its use. The landfill cover will be re-graded and seeded and the drainage channels will be armored with rock to promote positive drainage into Captain's Creek.

SWMU 32, 33, 34 and 35—Lead Reclamation Area and Half Tank/Settling Ponds

The lead reclamation area consists of a 1-acre parcel of lead contaminated surface soils. On behalf of the Army, IT will remove lead contaminated soils and confirm that remaining soils meet KDHE residential land-use standards. The 4 settling ponds and half tanks contain residual inorganic, semi-volatile and explosive contaminants. The Army will remove, consolidate and treat impacted soils for offsite disposal as Special Waste.

Current Status

The Army has completed all submittals and has initiated site mobilization for this interim removal action. Treatment may begin by late November with offsite disposal scheduled for mid December through the end of January. The Army anticipates approximately 5,000 tons of treated materials will be removed from the site. Ponds will be closed consistent with KDHE requirements and the areas will be restored to promote positive drainage.

GRAZING STUDY
BURNS & MCDONNELL

Presented November 14, 2001 at the
Sunflower Army Ammunition Plant Restoration Advisory Board Meeting

The purpose of the Grazing Study was to determine whether grazing should continue on the property at the Sunflower Army Ammunition Plant (SFAAP). The Grazing Study was designed to look at areas accessible to cattle or those areas used for hay production which are outside of the designated solid waste management units (SWMUs). The SFAAP property was divided into three study groups because studying the entire property as a whole would be cumbersome. The Northeast Area consisted of the property around SWMUs 1 and 50. Samples from this area were analyzed for metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), and explosives. The Central Area consisted of the property around Pyott's Pond and the wastewater treatment plant. Samples from this area were analyzed for metals, VOCs, SVOCs, PAHs, and explosives. The West Area consisted of the property around SWMUs 18, 19, 21, 22, and 32. Samples from this area were analyzed for metals, VOCs, SVOCs, PAHs, explosives, and dioxins. Soil, vegetation, surface water, and sediment samples were collected from each of the three areas based on a grid design. In the Northeast Area, only metals were detected. In the Central Area, only metals and PAHs common to roadways were detected. In the West Area, metals, PAHs, and dioxins were detected.

The metals were compared to the site background concentrations established in 1994. All detected concentrations were close to the background concentrations. Some were higher, and some were lower. There are no background concentrations available for PAHs, so all detected PAHs were retained. When the Draft Grazing Study was written in 1997, no background concentrations were available for dioxin. Since that time, background concentrations have been established. Three of the samples collected near SWMUs 18 and 19 were much higher than the other samples; therefore, these samples were assumed to be part of the SWMUs. The SWMUs were referenced to include these areas, and these three samples were removed from the calculations, as these areas were no longer accessible to cattle. Twelve of the remaining thirteen samples were less than the background range for dioxin. One sample was within the background range, and none were above the background range.

Next, non-cancer and cancer risk were calculated based on the detected concentrations and the assumption that people obtained their beef primarily from SFAAP. If the total hazard index is one or less, the site poses essentially no likelihood of causing adverse noncancer health effects. EPA's guidelines are that cancer risks should not be greater than 1 in 10,000 to 1 in 1,000,000. The Northeast and Central Areas were found to have no noncancer risk and cancer risk levels less than 1 in 1,000,000. The West Area was found to have no non-cancer risk and cancer risk of 1 in 10,000.

In the West Area, most of the risk is from dioxin. It is important to know that there are background levels of dioxin throughout the world. The site-specific background range for dioxin

at SFAAP is 4 to 7 parts per trillion (ppt). There have been many studies throughout the world conducted to calculate the background concentrations of dioxins and generally, the national average is 5 to 8 ppt. All samples from the West Area are below or within both the SFAAP and national background ranges. This means that cattle grazing at SFAAP are exposed to levels of dioxin that are similar to what would be found anywhere in the country. Likewise, the amount of dioxin in beef from SFAAP would also be at average background levels.

Conclusion

The Northeast and Central Areas were found to have no noncancer risk and cancer risk levels less than 1 in 1,000,000. The West Area was found to have no non-cancer risk and cancer risk of 1 in 10,000. Most of the risk in the West Area is from dioxin; however, all of the samples from the West Area are below or within both the SFAAP and national background ranges. Therefore, the cattle grazing at SFAAP are exposed to levels of dioxin that are similar to what would be found anywhere in the country. Likewise, the amount of dioxin in beef from SFAAP would also be at average background levels.

Attachment 3

Statement made by Penny Seavertson at the RAB meeting on November 14, 2001

Last July 2001, Tom Price, Terri Jones, and I met with the Army and other agencies because we were seeking environmental justice. We feel we have had an unfair burden of environmental pollutants due to our homes being in close proximity to SFAAP and living in a rural community.

Prior to our July 2001 meeting, we had been told at public forums that no debris would ever leave the SFAAP land. However, in June 2000, January 2001, and February 2001 we had debris on our land. The lab results that KDHE had done by ACT labs indicated 80% and 85% asbestos and when I contacted the lab, they said that it shouldn't be over 1%. That is why we asked to have the meeting here at SFAAP last July.

We were told at the meeting that Dr. Marotz (from K.U.) designed a model in 1996-1997 for the burns and for all the debris to remain at the plant. But, the model was adjusted without Dr. Marotz's knowledge or input. On page 18 of the Public Health Assessment for SFAAP, the conclusions state "ATSDR expects that when proper burning procedures are followed, the people who live around SFAAP are not being exposed to harmful levels of airborne asbestos or lead generated during the open burning." From what we heard at the July meeting, we don't think that proper burning procedures were followed. After all, we had high levels of asbestos debris on our land.

A handwritten signature in cursive script that reads "Penny Seavertson". The signature is written in dark ink and is positioned in the lower right quadrant of the page.

Attachment 4

That the RAB provide the following comment to the ATDSR:

The members of the Sunflower RAB, having heard from various members of the community, who suggest that not all relevant data, particularly regarding hazardous materials leaving the Sunflower site during burning procedures, had been considered, and who, therefore, call into question the conclusions based on apparent incomplete data, request the ATDSR to consider all relevant data and carefully reconsider its conclusions regarding the past, current and future impact on the health of people who work and live in the community from releases of environmental contaminants from SFAAP. We specifically request the ATDSR to re-examine data and conclusions regarding asbestos and lead leaving the site, the health implications of the wells near the site, and the health impact of consumption of meat products from animals grazing on the site.