



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

OCT 03 2019

Mr. Alan Hynek
Restoration Program Manager
Environmental Division, DPW
407 Pershing Court
IMNW-RLY-PWE
Fort Riley, Kansas 66442

Dear Mr. Hynek:

The U. S. Environmental Protection Agency is sending this letter to document the remaining issue with the Operable Unit 3 Remedial Action Completion Report, or RACR, for Fort Riley. The EPA provided the Army with comments regarding the Draft RACR on July 3, 2019. These comments included the need for the Army to provide a remedial timeframe calculation for groundwater restoration. As previously discussed, including during the August 19, 2019 project team meeting, the EPA will withhold official approval of the RACR until an accurate remedial timeframe calculation is provided and evaluated.

The purpose of including a remedial timeframe calculation in the RACR is to ensure that the selected remedy of monitored natural attenuation will meet the groundwater restoration requirements of the National Oil and Hazardous Substances Pollution Contingency Plan. Per 40 Code of Federal Regulations 300.430(a)(1)(iii)(F), "EPA expects to return usable ground waters to their beneficial uses wherever practicable, within a timeframe that is reasonable". This regulation is a key component of the EPA's principles for groundwater remediation at National Priority List sites. Regarding the meaning of "within a timeframe that is reasonable", the Federal Register Preamble from March 8, 1990 (volume 55, page 8732) states that "reasonable restoration time periods may range from very rapid (one to five years) to relatively extended (perhaps several decades). ... The most appropriate timeframe must, however, be determined through an analysis of alternatives."

It is the EPA's understanding that the Army is working to identify additional resources to calculate an accurate remedial timeframe for the groundwater remedy at Operable Unit 3. Please withhold issuance of the final RACR until this is resolved.

If you have any questions or concerns, please contact me by email at oconnor.daniel@epa.gov or at (913) 551-7868.

Sincerely,

Darryl O'Connor
Remedial Project Manager
Federal Facilities and Post Construction Section
Superfund and Emergency Management Division

cc: Mr. David Jones, IRP Project Manager for Fort Riley (email only)
Ms. Amanda Chirpich, USACE KC District (email only)
Mr. Mike Bowlby, AEC (email only)
Mr. Marc Radloff, KDHE (email only)

