FINAL SUMMARY TECHNICAL MEMORANDUM COMPOSITE SURFACE SOIL SAMPLING EVENT SHERMAN HEIGHTS SMALL ARMS RANGE (SHSAR) IMPACT SLOPE

FORT RILEY, KANSAS



Prepared for:

U.S. Army Corps of Engineers, Omaha District 1616 Capitol Avenue Omaha, Nebraska 68102-4901

Contract No. W9128F-16-D-0044

Task Order No: 0002

Prepared by:

TEHAMA, LLC 1600 Genessee Street, Suite 754 Kansas City, MO 64102

December 2020



2 December 2020

Mr. James Bouvier Project Manager, PM, MMDC Omaha District, USACE 1616 Capitol Avenue Omaha, NE 68102-4901

Subject: Transmittal of Summary Technical Memorandum Composite Surface Soil Sampling Event at the Sherman Heights Small Arms Range (SHSAR) Impact Slope, Operable Unit 008 (OU 008) Ft. Riley, Kansas Contract No. W9128F16D0044

Dear Mr. Bouvier:

Tehama is forwarding one electronic copy (PDF) via email of the subject document for your records. Distribution of hard copies and CDs via mail/courier and electronic copies (PDF) via email is detailed in the Cc:s referenced below. All CDs include the complete document with all appendices.

Please feel free to contact Dillon Moran at (816) 832-1876 or by email at <u>dillon.moran@tehamallc.com</u> or me at (816) 872-4729 or by email at <u>mark.snyder@tehamallc.com</u> with any questions.

Sincerely,

Mark G. Snyder, PE BCEE, D.WRE, PMP Program Manager | Environmental Tehama, LLC

Enclosure (PDF via email)

Cc: Jeff Keating, Ft. Riley DPW (w/ two hard copies w/ CDs, PDF) Michael Bowlby, AEC - Midwest Div. (w/ CD, PDF) Cathryn Mallonee, KDHE (w/ hard copy, CD, PDF) Danny O'Connor, EPA Region 7 (w/ PDF) Margaret Townsend, KDHE Dillon Moran, Tehama



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LIST OF ACRONYMS AND ABBREVIATIONS

ALS	ALS Global Laboratories
Bay West	Bay West, LLC
bgs	below ground surface
COPC	chemicals of potential concern
DoD	Department of Defense
DGM	digital geophysical mapping
ELAP	Environmental Laboratory Accreditation Program
EPA	Environmental Protection Agency
ft	feet
GPS	global positioning system
KDHE	Kansas Department of Health and Environment
LOD	limit of detection
LTM	long-term monitoring
LUC	Land Use Controls
MC	munitions constituents
MD	munitions debris
MEC	munitions explosives concern
mg/kg	milligrams per kilogram
MMRP	Military Munitions Response Program
MRS	Munitions Response Site
PP	Proposed Plan
ppm	parts per million
QCSR	Quality Control Summary Report
RCRA	Resource Conservation and Recovery Act
RDP	Remedial Design Plan
RG	Remediation Goal
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RIP	Remedy in Place
RLS	Registered Land Surveyor
ROD	Record of Decision



Regional Screening Level
real time kinematic
Sherman Heights Small Arms Range
Site Investigation
toxicity characteristic leaching procedure
Tehama, LLC
Tukuh Technologies, LLC
Technical Review Workgroup for Lead
U.S. Army Corps of Engineers
X-ray fluorescence



1.0 INTRODUCTION

This Summary Technical Memorandum discusses the 2020 composite surface soil sampling event conducted by Tehama, LLC (Tehama) at the Sherman Heights Small Arms Range (SHSAR) located at Ft. Riley, Kansas. In November 2017, following the establishment of Land Use Controls (LUCs), Tehama performed the first routine long-term monitoring (LTM) at the SHSAR in accordance with the approved Record of Decision (ROD) and collected 48 surface soil samples (40 parent samples, 4 duplicate, 2 matrix spikes and 2 matrix spike duplicates (Tehama, 2020). LTM surface soil sampling was performed around the perimeter of the fence line to confirm that lead was not migrating downslope beyond the remedy fence line. Due to lead concentrations at three discrete sample locations (SP17, SP38, and SP39) along the perimeter of the fence exceeding the remediation goal of 400 milligrams per kilogram (mg/kg) listed in the ROD, additional composite sampling to further characterize lead concentrations in the area of these samples was performed April 27th, 2020 in compliance with US Environmental Protection Agency (EPA) and Kansas Department of Health and Environment (KDHE) letters dated 11 September 2018 and 28 June 2018, respectively. EPA and KDHE letters are included in Appendix F.

Composite surface soil sampling was conducted to further characterize lead concentrations at three discrete surface soil sample locations (SP17, SP38 and SP39) which exceeded the remediation goal of 400 mg/kg during the November 2017 routine LTM surface soil sampling event. Composite samples were collected near the base of the slope along the southern fence line at discrete sample location SP17 and side slope along the western fence line at discrete sample locations SP38 and SP39.

2.0 SITE DESCRIPTION AND HISTORY

2.1 Site Description

Fort Riley is located in portions of Clay, Geary and Riley counties between the cities of Salina and Topeka in north central Kansas. The Installation covers more than 100,000 acres, which are divided into six cantonment areas (Main Post, Camp Forsyth, Camp Funston, Camp Whitside, Marshall Army Airfield and Custer Hill), maneuver areas, firing ranges and an Impact Area. Portions of Fort Riley are bounded by the cities of Riley, Junction City and Ogden, Kansas (Bay West, 2014a).

The SHSAR Impact Slope is a Munitions Response Site (MRS) that falls under the Military Munitions Response Program (MMRP) and is located near the southern Post boundary. The SHSAR extends approximately 150 to 400 feet (ft) wide by 8,000 ft in length (52.00 acres) and is located between the Colyer Manor military family housing complex and the Sherman Heights highlands (Bay West, 2014a). A Site Location Map, Figure 1 in Appendix A, details the site and surrounding features.

2.2 Summary of Contamination

In November 2010, Bay West, LLC (Bay West), completed the field phase of the Remedial Investigation (RI), including characterization for subsurface anomalies using digital geophysical mapping (DGM) and intrusive assessment across 16 acres, and real-time analog survey (mag and dig) across 36 acres (Bay West, 2014b). More than 2,000 subsurface anomalies were evaluated and three munitions explosives of



concern (MEC) items were identified during the intrusive assessment. Approximately 700 pounds of munitions debris (MD) and 5,700 pounds of non-MD were removed from the MRS.

An additional evaluation for munitions constituents (MC) in soil and groundwater was conducted based on the results of the RI. Incremental soil samples were collected from 0 to 0.5 ft bgs with the top surface soil removed to ensure the aliquot sample was not collected from surface slough. The 15 samples were analyzed by Bay West for Resource Conservation and Recovery Act (RCRA) metals (excluding mercury) by method 6010C and explosives by method 8330B. Lead was the only chemical of potential concern detected above the KDHE Tier 2 Risk-Based Residential Standard of 400 mg/kg. Lead concentrations for incremental soil sampling ranged from 14 mg/kg to 1,300 mg/kg.

Although groundwater sample collection was attempted at nine locations within three areas of the MRS, water was only encountered in the central portion of the MRS. One groundwater sample was collected from an interval between 54-56 feet below ground surface (bgs) and analyzed for RCRA metals (excluding mercury) by method 6010C and explosives by method 8330B (Bay West, 2014a). Explosives were not reported above the laboratory limit of detection (LOD) and metals were below the KDHE Tier 2 Risk-Based Residential Standards or the laboratory LOD.

To further delineate the horizontal and vertical extent of previously detected lead-impacted soil, supplemental X-ray fluorescence (XRF) analysis was completed. A total of 163 soil samples were collected from 0 to 0.5 ft bgs and an additional seven discrete samples were collected from 0.5 to 1.0 ft bgs and were analyzed with an XRF. Lead concentrations ranged from less than the LOD to 1,315 mg/kg, with 44 samples exceeding the field screening criteria of 300 mg/kg. Additional samples were collected from each location exceeding the field screening level by stepping out 100 ft laterally until XRF readings were below 300 mg/kg for two consecutive grids. All samples collected from 0.5-1.0 ft bgs were below screening criteria (Bay West, 2014a).

2.3 Site History and Previous Investigations

The SHSAR was reported to be operational from the late 1800s until the late 1980s. The site was used for a variety of munitions training activities: anti-aircraft and anti-tank ranges were used until 1946 while the small arms range remained in use until the late 1980s. The direction of fire was to the north, where elevations rise approximately 100 ft. Most of the area has been redeveloped into the Colyer Manor military family housing complex.

In 1994, soil sampling, followed by lead removal, occurred in a section of the Colyer Manor residential complex. Approximately 1,500 cubic yards of lead contaminated soil were removed to remediate to levels below the EPA Regional Screening Level (RSL) of 400 mg/kg for lead. In addition, a full surface and subsurface MEC survey was completed.

A Site Investigation (SI) was completed during 2005 that evaluated the firing points and the Impact Slope separately. No MEC or MD was found during the survey of the firing points and no further action was recommended for this site. The SI recommended further investigation of the Impact Slope due to the presence of potential MEC items and metals contamination in soils.



In 2014, Bay West conducted a Remedial Investigation/Feasibility Study (RI/FS) to evaluate remedial options for additional lead-contaminated soils. The RI/FS recommended LUCs based on an analysis of site contaminants, current and future use, protection of human health and the environment, and ability to implement and cost (Bay West, 2014a). Sampling locations and results from the RI are displayed on Figure 2-4. A Proposed Plan (PP) was made available to the public, and it identified the preferred alternative as LUCs for lead-impacted soils at the MRS. Following stakeholder review and a public comment period, a final PP was completed in November 2014.

The Final ROD presented the selected remedy as Alternative 2: (LUCs; Land Use Requirements). The major components of the selected remedy are public education, legal restrictions on future land use, physical access restrictions, and LTM and maintenance consisting of soil sampling to be performed every two years, groundwater sampling to be performed every five years, inspection/maintenance of the physical barrier annually, and five year reviews. The ROD also identified the location where the perimeter fence was to be located to limit access to the area containing lead in excess of the Remediation Goal (RG) (USACE, 2016). Table 1 displays the LTM sampling requirements up until 2030.

LTM Sampling Requirement	Year to be Performed
Groundwater Sampling	2021
Soil Sampling	2022
Soil Sampling	2024
Groundwater/Soil Sampling	2026
Soil Sampling	2028
Soil Sampling	2030

Table 1: LTM Sampling Requirements until 2030

2.4 Contaminates of Potential Concern

The soil and groundwater data used in the risk assessment were collected in 2010 and 2011 as part of the SHSAR Impact Slope MRS Remedial Investigation (RI). Inorganic contaminant concentrations that were less than or equal to background levels were excluded as chemicals of potential concern (COPCs). Arsenic, chromium, and lead concentrations exceeded RSLs, however, chromium did not exceed background. The maximum arsenic concentration (5 mg/kg) was slightly above background (4.6 mg/kg) but did not exceed the KDHE Tier 2 level for residential soil (11.3 mg/kg), so arsenic was excluded as a COPC. Only lead is considered a human health chemical of concern in soil for the site (USACE, 2016).



3.0 SAMPLING PROGRAM

3.1 Surveying

On April 27, 2020 Tukuh Technologies, LLC (Tukuh), under contract to Tehama, LLC, surveyed and staked the 5-point composite sampling points in the area of SP17, SP38, and SP39 in accordance with the approved Remedial Design Plan (RDP) Addendum (Tehama, 2020). The survey was completed by a Registered Land Surveyor (RLS) in the State of Kansas using a real-time kinematic (RTK)-global positioning system (GPS). Survey coordinates for the sample points are included in Appendix B. The projection used to collect the surface soil sample locations was in Kansas State Plane – North, the datum used was NAD83 and the point data layout is described as Point, Northing, Easting, Elevation, and Description.

3.2 Surface Soil Sampling

Tehama mobilized to the site on April 27, 2020 and began sample collection activities in the area of SP17, SP38, and SP39. Tehama personnel collected 3 parent samples and one duplicate sample from 0-0.5 ft bgs, each comprised of a 5-point composite sample which was combined to make one composite sample. All sample locations are depicted on Figure 2 (Appendix A) and were collected as close as possible to the surveyed sampling points. Photographs of the site and sample locations are provided in Appendix G.

The 5-point surface soil samples were collected using stainless steel trowels from the upper 6 inches of soil. Samples were sieved twice, first with a No. 4 sieve in the field to remove bulk debris, then jarred, labeled and shipped for laboratory sieving with a No. 60 sieve to obtain the fine fraction; followed by laboratory analysis of the fine fraction material as recommended in the TRW Recommendations for Performing Human Health Risk Analyses on Small Arms Shooting Ranges (EPA, 2003b).

Each sample was placed in a laboratory-supplied 2 oz. glass jar, labeled with pertinent identifying information (e.g., sample ID, sample collection date and time, analysis to be performed, sampler's initials), placed in a cooler with ice and maintained at 4 °C during transportation to ALS Global Laboratories (ALS) under standard chain-of-custody protocol. ALS is a Department of Defense (DoD), Environmental Laboratory Accreditation Program (ELAP) accredited laboratory based in Houston, Texas.

Soil sampling expendables such as trowels and nitrile gloves were contained in plastic bags and disposed of as municipal trash. New trowels were utilized for each sampling location; therefore, decontamination of sampling equipment was not necessary and the potential for cross-contamination between sampling points was eliminated.

3.3 Analytical Results

Analytical results indicated detections of lead in all three parent samples and one duplicate sample. Analytical results indicated two exceedances of the lead RG of 400 mg/kg. Soil samples SHSAR/SP38/SS02/0-0.5' and SHSAR/SP39/SS02/0-0.5' contained lead at concentrations of 2,530 mg/kg, 415 mg/kg respectively.



Soil sample SHSAR/SP38/SS02/0-0.5' was collected near the middle of the slope, along the western fence line with SHSAR/SP39/SS02/0-0.5' collected approximately 100 feet north. Figure 2 identifies the sample locations and corresponding detections for samples above the RG. Table 1 in Appendix C provides a summary of analytical data. The complete laboratory analytical report prepared by ALS can be found in Appendix D.

3.4 Quality Control Summary Report

Data validation of the surface soil sample data set was completed and the results are presented in a Quality Control Summary Report (QCSR). All data was found to be acceptable and no data were qualified during the review. All project completeness goals were met, and all data are usable as reported by the laboratory. The QCSR and ADR.net generated summary reports are provided in Appendix E.

3.5 Recommendations

Based on the 2020 composite sampling event exceedances above the RG of 400 mg/kg at sampling locations SP38 and SP39, Tehama recommends further characterization and delineation of the extent of lead contamination along the outer fence line of the western slope at the SHSAR proximate to SP38 and SP39. Five-point composite soil samples are recommended for collection and submittal for laboratory analysis in accordance with the sampling protocol in the 2003 Superfund Lead-Contaminated Residential Sites Handbook (EPA, 2003a).

Future sampling will fully delineate the extent of contamination. Additional fencing would then be installed to surround the newly delineated area. The additional fencing would follow the current in-place fencing design.

This option achieves remedy in place (RIP) in accordance with the ROD by restricting access to areas of contamination through LUCs.

4.0 REFERENCES

- Bay West, 2014a. Remedial Investigation/Feasibility Study, Sherman Heights Small Arms Range Impact Slope Munitions Response Site, Fort Riley, Junction City, Kansas. Prepared for the U.S. Army Corps of Engineers, Omaha District. February.
- Bay West, 2014b. Proposed Plan. Prepared for the U.S. Army Corps of Engineers, Omaha District. August.
- EPA, 2003a. Superfund Lead-Contaminated Residential Sites Handbook, EPA, Lead Sites Workgroup. August.
- EPA, 2003b. TRW Recommendations for Performing Human Health Risk Analyses on Small Arms Shooting Ranges, EPA TRW. March
- Tehama, 2020, *Remedial Design Plan Addendum, Sherman Heights Small Arms Range, Impact Slope, Fort Riley, Kansas.* Prepared for the U.S. Army Corps of Engineers, Omaha District. February.

U.S. Army Corps of Engineers, Omaha District, *Record of Decision*, Revision 03, Fort Riley, Sherman Heights Small Arms Range, Impact Slope, Junction City, Kansas, January.



Appendix A

FIGURES



SHSAR/SP39/SS02/0-0.5' 415 mg/Kg

> SHSAR/SP39/SS01/0-0.5' 460 mg/Kg

SHSAR/SP38/SS01/0-0.5' 446 mg/Kg

SHSAR/SP38/SS02/0-0.5' 2,530 mg/Kg

> SHSAR/SP17/SS02/0-0.5' 105 mg/Kg

SHSAR/SP17/SS01/0-0.5' 464 mg/Kg

Legend

- 2017 Soil Sample > 400 mg/Kg
- 2020 Composite Sample > 400 mg/Kg
- 2020 Composite Sample < 400 mg/Kg
 - Fence Location

Note: The 2020 composite samples were collected from a five-point composite with the middle sample location being the same as the 2017 discrete surface soil sample.

Record of Decision Sherman Heights Small Arms Range Impact Slope Fort Riley, Kansas

Appendix B

SURVEY DATA

Appendix B — Survey Data Composite Surface Soil Sampling Event Sherman Heights Small Arms Range Impact Slope, Fort Riley, Kansas

Sample Name	Point	Northing	Easting	Elevation	Description
SHSAR/SP17/SS02/0-0.5'	5000	271554.630	1649405.694	1078.664	Center Soil Sample
SHSAR/SP17/SS02/0-0.5'	5001	271556.522	1649401.139	1077.663	Northwest Soil Sample
SHSAR/SP17/SS02/0-0.5'	5002	271554.013	1649400.125	1077.240	Southwest Soil Sample
SHSAR/SP17/SS02/0-0.5'	5003	271550.160	1649408.899	1079.239	Southeast Soil Sample
SHSAR/SP17/SS02/0-0.5'	5004	271552.337	1649410.182	1079.757	Northeast Soil Sample
SHSAR/SP38/SS02/0-0.5'	5005	272055.465	1648686.435	1123.531	Center Soil Sample
SHSAR/SP38/SS02/0-0.5'	5006	272050.950	1648684.113	1121.563	Southeast Soil Sample
SHSAR/SP38/SS02/0-0.5'	5007	272060.211	1648687.287	1125.221	Northeast Soil Sample
SHSAR/SP38/SS02/0-0.5'	5008	272060.211	1648684.494	1125.452	Northwest Soil Sample
SHSAR/SP38/SS02/0-0.5'	5009	272051.930	1648680.871	1121.510	Southwest Soil Sample
SHSAR/SP39/SS02/0-0.5'	5010	272102.626	1648702.684	1141.453	Center Soil Sample
SHSAR/SP39/SS02/0-0.5'	5011	272107.665	1648704.722	1143.942	Northeast Soil Sample
SHSAR/SP39/SS02/0-0.5'	5012	272108.538	1648701.715	1143.899	Northwest Soil Sample
SHSAR/SP39/SS02/0-0.5'	5013	272097.572	1648701.011	1139.257	Southeast Soil Sample
SHSAR/SP39/SS02/0-0.5'	5014	272098.716	1648698.036	1139.373	Southwest Soil Sample

Appendix C

LABORATORY DATA SUMMARY TABLE

Appendix C — Laboratory Data Summary Table Composite Surface Soil Sampling Event Sherman Heights Small Arms Range Impact Slope, Fort Riley, Kansas

Analyte	RSL	Units	SHSAR/SP17/ SS02/0-0.5'	SHSAR/SP38/ SS02/0-0.5'	SHSAR/SP39/ SS02/0-0.5'	SHSAR/SP17/ SS02/0-0.5' (SS02 DUP)
Lead by Method SW6020A						
Lead mg/kg	400	mg/Kg	105	2,530	415	106

Notes:

mg/kg = milligrams per kilogram

Shaded = Exceeds RSL

Appendix D

LABORATORY ANALYTICAL REPORT

10450 Stancliff Rd. Suite 210 Houston, TX 77099 T: +1 281 530 5656 F: +1 281 530 5887

May 13, 2020

Megan Perez-Utter Tehama, LLC. 1600 Genessee Kansas City, MO 64102

Work Order: **HS20041225**

Laboratory Results for: Sherman Heights Small Arms Range

Dear Megan,

ALS Environmental received 4 sample(s) on Apr 30, 2020 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: DANE.WACASEY Dane J. Wacasey

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Tehama, LLC. Client: Sherman Heights Small Arms Range Project: Work Order: HS20041225

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS20041225-01	SHSAR/SP17/SS02/0-0.5'	Soil		27-Apr-2020 13:00	30-Apr-2020 08:45	
HS20041225-02	SHSAR/SP38/SS02/0-0.5'	Soil		27-Apr-2020 14:00	30-Apr-2020 08:45	
HS20041225-03	SHSAR/SP39/SS02/0-0.5'	Soil		27-Apr-2020 13:30	30-Apr-2020 08:45	
HS20041225-04	SHSAR/SP17/SS02DUP/0-0.5'	Soil		27-Apr-2020 13:00	30-Apr-2020 08:45	

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ALS Houston, US

CASE NARRATIVE

Client:Tehama, LLC.Project:Sherman Heights Small Arms RangeWork Order:HS20041225

Work Order Comments

• Samples were air dried at the laboratory from May 1, 2020 through May 4, 2020. The samples were sieved on May 4, 2020 with the mass passing through a No. 60 sieve used for SW6020 analysis.

Metals by Method SW6020

Batch ID: 153336

Sample ID: SHSAR/SP38/SS02/0-0.5' (HS20041225-02MS)

• The MS and/or MSD recovery was outside of the control; however, the result in the parent sample is greater than 4x the spike amount. Lead

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ALS Houston, US		Date: 13-Ma						
Client:	Tehama, LLC.		ANALYTICAL REPOR					
Project:	Sherman Heights Sma	all Arms Ra	nge		WorkOrder:HS20041225			
Sample ID:	SHSAR/SP17/SS02/0-	-0.5'			Lab ID:HS20041225-01			
Collection Date:	27-Apr-2020 13:00 Matrix:Soil							
ANALYSES	RESULT QUAL	DL	LOD	LOQ	UNITS	DILUTION FACTOR	DATE ANALYZED	
METALS BY SW6020A Method:SW6020					Prep:SW3050A	A / 07-May-2020	Analyst: JC	
Lead	105	0.0124	0.0953	0.477	mg/Kg	1	11-May-2020 16:37	

ALS Houston, US		Date: 13-May-2					
Client:	Tehama, LLC.		ANALYTICAL REPOR				
Project:	Sherman Heights Small	Arms Rar	WorkOrder:HS20041225				
Sample ID:	SHSAR/SP38/SS02/0-0).5'	Lab ID:HS20041225-02				
Collection Date:	27-Apr-2020 14:00 Ma						
ANALYSES	RESULT QUAL	DL	LOD	LOQ	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A Method:SW6020					Prep:SW3050A	A / 07-May-2020	Analyst: JC
Lead	2,530	1.22	9.36	46.8	mg/Kg	100	11-May-2020 17:34

ALS Houston, US					Date: 13-May-20		
Client:	Tehama, LLC.		ANALYTICAL REPO				
Project:	Sherman Heights Sma	ll Arms Rar		WorkOrder:HS20041225			
Sample ID:	SHSAR/SP39/SS02/0-	0.5'		Lab ID:HS20041225-03			
Collection Date:	27-Apr-2020 13:30 Matrix:Soi						
ANALYSES	RESULT QUAL	DL	LOD	LOQ	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A Method:SW6020					Prep:SW3050A	A / 07-May-2020	Analyst: JC
Lead	415	0.238	1.83	9.14	mg/Kg	20	11-May-2020 17:49

ALS Houston, US					Date: 13-May-20		
Client:	Tehama, LLC.						
Project:	Sherman Heights Sma	all Arms Ra	nge		WorkOrder:HS20041225		
Sample ID:	SHSAR/SP17/SS02DU	JP/0-0.5'			Lab ID:HS20041225-04		
Collection Date:	27-Apr-2020 13:00 Matrix:Soil						
ANALYSES	RESULT QUAL	DL	LOD	LOQ	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A		Prep:SW3050A	v / 07-May-2020	Analyst: JC			
Lead	106	0.0121	0.0930	0.465	mg/Kg	1	11-May-2020 17:04

Weight / Prep Log

Client:Tehama, LLC.Project:Sherman Heights Small Arms RangeWorkOrder:HS20041225

Batch ID: 153336	Start Date	: 08 May 20	020 08:01	End Date: 08 May 2020 14:00	
Method: METALS PREP -	SOLIDS - SW	3050B			Prep Code: 3050_I_LOW
Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS20041225-01		0.5244 (g)	50 (mL)	95.35	
HS20041225-02		0.5343 (g)	50 (mL)	93.58	
HS20041225-03		0.5469 (g)	50 (mL)	91.42	
HS20041225-04		0.5375 (g)	50 (mL)	93.02	

Client:	Tehama, LLC.					
Project:	Sherman Heights Sma	all Arms Range			DATES RE	PORT
WorkOrder:	HS20041225					
Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 153336	(0) Test Name : M	ETALS BY SW6020A			Matrix: Soil	
HS20041225-01	SHSAR/SP17/SS02/0-0.5'	27 Apr 2020 13:00		07 May 2020 14:00	11 May 2020 16:37	1
HS20041225-02	SHSAR/SP38/SS02/0-0.5'	27 Apr 2020 14:00		07 May 2020 14:00	11 May 2020 17:34	100
HS20041225-03	SHSAR/SP39/SS02/0-0.5'	27 Apr 2020 13:30		07 May 2020 14:00	11 May 2020 17:49	20
HS20041225-04	SHSAR/SP17/SS02DUP/0- 0.5'	27 Apr 2020 13:00		07 May 2020 14:00	11 May 2020 17:04	1

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ALS Houston, US

QC BATCH REPORT

Client:Tehama, LLC.Project:Sherman Heights Small Arms RangeWorkOrder:HS20041225

Batch ID:	153336 (0)	Instrumer	it: ICPMS05	Method:	METALS BY SW6020A	
MBLK Client ID:	Sample ID: I	MBLK-153336 Run ID:	Units: ICPMS05_361351	mg/Kg An SeqNo: 5580233	alysis Date: 11-May-2020 16:32 PrepDate: 07-May-2020 DF: 1	
Analyte		Result	PQL SPK Val	SPK Ref Value %REC	Control RPD Ref RPD Limit Value %RPD Limit Qua	ıl
Lead		0.01426	0.479			J
LCS Client ID:	Sample ID: I	LCS-153336 Run ID:	Units: ICPMS05_361351	mg/Kg An SeqNo: 5580247	alysis Date: 11-May-2020 16:34 PrepDate: 07-May-2020 DF: 1	
Analyte		Result	PQL SPK Val	SPK Ref Value %REC	Control RPD Ref RPD Limit Value %RPD Limit Qua	ıl
Lead		9.402	0.489 9.789	0 96.0	80 - 120	
MS	Sample ID: I	HS20041225-02MS	Units:	mg/Kg An	alysis Date: 11-May-2020 16:44 PrenDate: 07-May-2020 DE: 1	
Analyte		Result	PQL SPK Val	SPK Ref Value %REC	Control RPD Ref RPD Limit Value %RPD Limit Qua	ıl
Lead		977.7	0.464 9.273	2398 -15300	75 - 125 Sł	Ξ0
MSD Client ID:	Sample ID: I SHSAR/SP38/SS02/0-	HS20041225-02MSD .0.5' Run ID:	Units: ICPMS05_361351	mg/Kg An SeqNo: 5580239	alysis Date: 11-May-2020 16:46 PrepDate: 07-May-2020 DF: 1	
Analyte		Result	PQL SPK Val	SPK Ref Value %REC	Control RPD Ref RPD Limit Value %RPD Limit Qua	ŧl
Lead		857.8	0.473 9.464	2398 -16300	75 - 125 977.7 13.1 20 Sł	Ξ0
PDS	Sample ID:	HS20041225-02PDS	Units:	mg/Kg An	alysis Date: 11-May-2020 17:39	
Client ID:	SHSAR/SP38/SS02/0-	•0.5' Run ID:	ICPMS05_361351	SeqNo: 5580306	PrepDate: 07-May-2020 DF: 100	
Analyte		Result	PQL SPK Val	SPK Ref Value %REC	Control RPD Ref RPD Limit Value %RPD Limit Qua	ıl
Lead		3473	46.8 935.8	2531 101	75 - 125	
SD	Sample ID:	HS20041225-02SD	Units:	mg/Kg An	alvsis Date: 11-May-2020 17:36	
Client ID:	SHSAR/SP38/SS02/0-	•0.5' Run ID:	ICPMS05_361351	SeqNo: 5580305	PrepDate: 07-May-2020 DF: 500	
				SPK Ref	Control RPD Ref %D	
Analyte		Result	PQL SPK Val	Value %REC	Limit Value %D Limit Qua	ıl
Lead		Result 2453	PQL SPK Val	Value %REC	Limit Value %D Limit Qua	al

ALS Houston, US

Client:	Tehama, LLC.	QUALIFIERS,
Project:	Sherman Heights Small Arms Range	ACRONYMS, UNITS
WorkOrder:	HS20041225	
Qualifier	Description	
*	Value exceeds Regulatory Limit	
а	Not accredited	
В	Analyte detected in the associated Method Blank above the Reporting Limit	
E	Value above quantitation range	
Н	Analyzed outside of Holding Time	
J	Analyte detected below quantitation limit	
М	Manually integrated, see raw data for justification	
n	Not offered for accreditation	
ND	Not Detected at the Reporting Limit	
0	Sample amount is > 4 times amount spiked	
Р	Dual Column results percent difference > 40%	
R	RPD above laboratory control limit	
S	Spike Recovery outside laboratory control limits	
U	Analyzed but not detected above the MDL/SDL	
Acronym	Description	
DCS	Detectability Check Study	
DUP	Method Duplicate	
LCS	Laboratory Control Sample	
LCSD	Laboratory Control Sample Duplicate	
MBLK	Method Blank	
MDL	Method Detection Limit	
MQL	Method Quantitation Limit	
MS	Matrix Spike	
MSD	Matrix Spike Duplicate	
PDS	Post Digestion Spike	
PQL	Practical Quantitaion Limit	
SD	Serial Dilution	
SDL	Sample Detection Limit	
TRRP	Texas Risk Reduction Program	

CERTIFICATIONS, ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arkansas	20-030-0	26-Mar-2021
Dept of Defense	ANAB L2231 V009	22-Dec-2021
Florida	E87611-28	30-Jun-2020
Kansas	E-10352 2019-2020	31-Jul-2020
Louisiana	03087, 2019-2020	30-Jun-2020
Maryland	343, 2019-2020	30-Jun-2020
North Carolina	624-2020	31-Dec-2020
Oklahoma	2019-141	31-Aug-2020
Texas	T104704231-20-26	30-Apr-2021

					Sample Receipt Checklist
Work Order ID: Client Name:	HS20041225 Tehama		Date/ Recei	Time Received: ved by:	<u>30-Apr-2020 08:45</u> Jared R. Makan
Completed By	/S/ Nilesh D. Ranchod	30-Apr-2020 17:46	Reviewed by: /S/	Dane J. Wacasey	05-May-2020 17:40
	eSignature	Date/Time		eSignature	Date/Time
Matrices:	Soil		Carrier name:	<u>FedEx Priori</u>	ty Overnight
Shipping contai Custody seals i Custody seals i VOA/TX1005/T Chain of custod Chain of custod Samplers name Chain of custod Samples in prop Sample contain Sufficient samp All samples rec Container/Temp	ner/cooler in good condition? ntact on shipping container/coole ntact on sample bottles? X1006 Solids in hermetically sea y present? y signed when relinquished and present on COC? y agrees with sample labels? per container/bottle? ers intact? le volume for indicated test? eived within holding time? p Blank temperature in compliance	r? ed vials? received? re?	Yes V Yes V	No	Not Present Not Present Not Present Not Present 1 Page(s) COC IDs:222156
Temperature(s)	/Thermometer(s):		1.1°C UC/C		IR # 25
Cooler(s)/Kit(s)	nle(s) sent to storage:		46004		
Water - VOA via Water - pH acco pH adjusted? pH adjusted by: Login Notes:	als have zero headspace? eptable upon receipt?		Yes Yes Yes	No No No	o VOA vials submitted N/A N/A N/A
Client Contacte	d:	Date Contacted:		Person Conta	acted:
Contacted By:		Regarding:			
Comments:					
Corrective Actio	on:				

		Cincinnati, OH +1 513 733 5336 Everett, WA +1 425 356 2600	Fort Collins, CO +1 970 490 151 Holland, MI +1 616 399 6076	, Cha	in of Cus	stody F 2221	-or n 56	n II	Sher	HS2(Teha man Heigh	04122 ma, LLC ts Small A	25). rms Rang	,∾]e
	Customer Information		1	Drojoch Info	ALS Projec	t Manager	r:						
Purchase Order			Project Name	Project into	mation								
Work Order			Project Number	Sherman H	leights Arms R	lange	A	ICP_S_	_ow (6020	Lead Only)			
Company Name	Tehama, LLC.		Bill To Company	Tehama i			C	MOIST	ASTM (M	oisture %)	·	Ala	1.6.1
Send Report To	Dillon Moran		Invoice Attn	Dillon Mora	n			<u>an an</u>	y pre	M SIE	e why	<u>n 100</u>	, 00 sieu
Address	1600 Genessee St. Sulk 760		Address	1600 Gene	SSOE		E						
City/State/Zip	Kansas City, MO 6410	02	City/State/Zip	Kansas Cit	MO 64102		G						
Phone	(816) 533-2246		Phone	(816) 533-2	246		H						
Fax			Fax		······		1						
e-Mail Address	Dillon.Moran@Tehama	aLLC.com	e-Mail Address	Dillon, Mora	n@TehamaLL	C.com	J						
No.	Sample Description	ingen Alexander af der ef	Date T	me Mat	ix Pres.	# Bottles		B	0 0	EF			
2 5 H 5 A R 3 5 H 5 A R 4 5 H 5 A R 5 6 H 5 A R 6 5 H 5 A R 7 8 9 10 Sampler(s) Please Br	15 38/5502 15 38/5502 15 39/5502 15 39/5502 15 17/5502 15 17/	12/0-05 0 NS/0-05 0 NS/0-05 4 0-0.5 4 Up/0-05 4	127120 140 127120 140 127120 140 127120 140 127120 13 127120 13		None Nore I nore I none I none		XXXXX XXXX			-29-2			
Relinquished by: Relinquished by: Logged by (Laboratory): Preservative Key:	Date	1/29/20 1/29/20 1/30/20 Time SQ: 4-NaOH	Shipment Meth 	ed by: ed by (Laboratory): tMAMMV ed by (Laboratory):	STD 10 Wk Da		5 Wk De Notes: Coc	Box) ays Sherr oler ID	Other 2 Wk Days nan Heigh Cooler Temp 1.1 [M2S	124 ts Small Am	Hour Hour Result: Hour Stange (Check One I II Std OC I II Std OC/Raw I V SW848/CI P	Box Below)	TRRP Checklist TRRP Level IV

Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
 Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
 The Chain of Custody is a legal document. All information must be completed accurately.

Copyright 2011 by ALS Environmental.

Page 14 of 15


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1600 4 APR 3 0 2020
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Appendix E

QCSR AND ADR REPORTS

May 28, 2020

Mr. Jim Bouvier United States Army Corps of Engineers CENWO-PM-H – Omaha District 1616 Capital Avenue Omaha, Nebraska 68102-4901

 Re: Quality Control Summary Report – April 2020 Sampling Event Sherman Heights Small Arms Range (Site)
 Fort Riley, Kansas
 Contract No. W9128F-16-D-0044, T.O. 002

Dear Mr. Bouvier:

This Quality Control Summary Report (QCSR) presents the data validation summary for the follow-up sampling event to evaluate lead concentrations on the downslope side of the installed fence line. The initial sampling event was conducted in November 2017 in order to evaluate that lead-contaminated soil was not migrating downslope, beyond the remedy fence line at the Site. The data validation was conducted in accordance with the corresponding *Uniform Federal Policy-Quality Assurance Project Plan (UFP-QAPP) Sherman Heights Small Arms Range, Fort Riley, Kansas* (April 2017) (UFP-QAPP). The data were validated utilizing Automated Data Review (ADR) software from Laboratory Data Consultants.

Soil samples were collected April 27, 2020 at the Site and sent off-site for analysis of lead by SW-846 6020. ALS of Houston, Texas (ALS) was the selected laboratory for these sample analyses. All samples were analyzed and reported under one sample delivery group (SDG): HS20041225. This QCSR summarizes the data review for the noted SDG. The following items were reviewed during the course of this data review. Any data qualifiers added based on this review are presented in the Data Qualifier Summary.

- <u>Chain of Custody (COC) Review</u>: The COC was completed and the appropriate signatures noted. A copy of the COC is provided in the noted SDG. Samples arrived at ALS within the sample preservation temperature range of less than 6 degrees Celsius.
- <u>Sample Holding Times</u>: Holding Time for the samples analyzed during this review was as follows:
 - Lead by method 6020: 180 days

All samples were analyzed within the noted holding time.

Mr. Jim Bouvier United States Army Corps of Engineers CENWO-PM-H – Omaha District May 28, 2020 Page 2

• <u>Method Blanks</u>: Method blanks were reviewed to assess possible cross-contamination or carry over in sample preparation or analysis. General qualification was as follows: any detection noted in the blank was reviewed in the associated sample(s). If the sample exhibited a detection of said analyte less than five times this blank detection (or ten times for common laboratory contaminants), the sample was disregarded as false positive and qualified as undetected (U).

One method blank detection was noted during this review. However, all associated samples were greater than five times this blank detection. Therefore, no qualifiers were necessary. A Method Blank Outlier Report is included summarizing this detection.

- <u>Laboratory Control Samples</u>: A Laboratory Control Sample (LCS) was analyzed for the reported QC batch. LCS percent recoveries (RECs) outside control limits can indicate potential problems with analytical accuracy. The reported LCS REC for this data review was within control limits. The LCS Outlier Report was generated and included herein.
- <u>Matrix Spikes (MS)/Matrix Spike Duplicates (MSDs)</u>: One site-specific MS/MSD was reported for this sampling event. MS/MSD RECs outside control limits can indicate potential problems with analytical accuracy, while the MS/MSD relative percent difference (RPD) may indicate problems with analytical precision.

The MS/MSD Outlier Report was generated and is included herein. Note: although the report notes the MS/MSD RECs as outside control limits, further review was performed and found that the MS/MSD spike amounts were less than one-fourth the parent sample concentration. In other words, the spike amount was too low to allow accurate recovery due to the high lead concentration. No data qualifiers were added based on this project-specific MS/MSD.

• <u>Miscellaneous QC Samples</u>: Due to the high lead concentration in the parent sample used for the MS/MSD yielding inconclusive results, the laboratory reported a post digestion spike (PDS) and serial dilution sample. Both of these QC samples yielded acceptable results, and no further actions were necessary. Review of these items were made utilizing the analytical hardcopy as these QC data were not included in the ADR deliverable.

Mr. Jim Bouvier United States Army Corps of Engineers CENWO-PM-H – Omaha District May 28, 2020 Page 3

- <u>Field Duplicates</u>: One field duplicate pair was collected and analyzed for this sampling event. A Field Duplicate Relative Percent Difference (RPD) Report was generated and is included herein. The following field duplicate pair was collected:
 - o SHSAR/SP17/SS02/0-0.5' and SHSAR/SP17/SS02DUP/0-0.5'

The lead results for this field duplicate pair were adequately replicated, and no further review was necessary. The Field Duplicate RPD Report was generated and included herein.

In conclusion, no data were qualified during the course of this review. All project completeness goals were met, and all data are usable as reported by the laboratory. ADR.net generated summary reports are included for the aforementioned QC items and included within this QCSR.

If you have any questions regarding this QCSR or the data contained within the ADR.net validation packages, please call me at (816) 822-3940.

Sincerely,

Shauna Lourenp

Shauna Lawrence

cc: Dillon Moran, Tehama, LLC

Data Review Sample Summary Report by Analysis Method

Reviewed By:			Approved By:		Laboratory: ALSHS		
Client Sample ID	Lab Sample ID	Matrix	Sample Type	Preparation Method	Collection Date	Validation Code	
Lab Reporting Batch:	HS20041225					,	
Method: 6020							
SHSAR/SP38/SS02/0-0.5	HS20041225-02	Soil	Field_Sample	SW3050	4/27/2020 2:00:00 PM	S2AVE	
SHSAR/SP38/SS02/0-0.5MS	HS20041225-02MS	Soil	Matrix_Spike	SW3050	4/27/2020 2:00:00 PM	S2AVE	
SHSAR/SP17/SS02DUP/0-0.5	HS20041225-04	Soil	Field_Duplicate	SW3050	4/27/2020 1:00:00 PM	S2AVE	
SHSAR/SP38/SS02/0-0.5MSD	HS20041225-02MSD	Soil	Matrix_Spike_Duplicate	SW3050	4/27/2020 2:00:00 PM	S2AVE	
SHSAR/SP39/SS02/0-0.5	HS20041225-03	Soil	Field_Sample	SW3050	4/27/2020 1:30:00 PM	S2AVE	
SHSAR/SP17/SS02/0-0.5	HS20041225-01	Soil	Field_Sample	SW3050	4/27/2020 1:00:00 PM	S2AVE	

Data Review Sample Summary Report by Analysis Method

Reviewed By	:		Approved By:		Lab	oratory: ALSHS
Client Sample ID Lab Sample ID		ab Sample ID Matrix So		Preparation Method	Collection Date	Validation Code
Validation	Label Legend					
Label Code	Label Decription		EPA Level			
S1VE	Stage_1_Validation_Electronic		N/A			
S1VM	Stage_1_Validation_Manual		N/A			
S1VEM	Stage_1_Validation_Electronic_and_N	lanual	N/A			
S2AVE	Stage_2A_Validation_Electronic		Level 3 w/o calil	bration		
S2AVM	Stage_2A_Validation_Manual		Level 3 w/o calil	bration		
S2AVEM	Stage_2A_Validation_Electronic_and_	Manual	Level 3 w/o calil	bration		
S2BVE	Stage_2B_Validation_Electronic		Level 3 with cali	bration		
S2BVM	Stage_2B_Validation_Manual		Level 3 with cali	bration		
S2BVEM	Stage_2B_Validation_Electronic_and_	Manual	Level 3 with cali	bration		
S3VE	Stage_3_Validation_Electronic		Level 4			
S3VM	Stage_3_Validation_Manual		Level 4			
S3VEM	Stage_3_Validation_Electronic_and_N	lanual	Level 4			
S4VE	Stage_4_Validation_Electronic		Level 4			
S4VM	Stage_4_Validation_Manual		Level 4			
S4VEM	Stage_4_Validation_Electronic_and_N	lanual	Level 4			
NV	Not_Validated		N/A			

Data Review Summary

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225_SEDD

Laboratory: ALSHS eQAPP Name: ShermanHeights

Validation Area	Note
Technical Holding Times	A
Temperature	A
Initial Calibration	N
Continuing Calibration/Initial Calibration Verification	N
Method Blanks	SR
Surrogate/Tracer Spikes	N
Matrix Spike/Matrix Spike Duplicates	SR
Laboratory Duplicates	N
Laboratory Replicates	N
Laboratory Control Samples	A
Compound Quantitation	A
Field Duplicates	N
Field Triplicates	N
Field Blanks	N

A = Acceptable, N = Not provided/applicable, SR = See report

The contents of this report reflect findings made by ADR during Automated Data Review, manual applied qualifiers are not considered. Please refer to the Overall Qualifier Summary report for manual qualifiers.

5/26/2020 4:35:06 PM

ADR version 1.9.0.325 (Licensed For Use On USACE Projects Only)

Temperature Outliers

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225_SEDD Laboratory: ALSHS eQAPP Name: ShermanHeights

No Data Review Qualifiers Applied.

QC Outlier Report: HoldingTimes

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225_SEDD

Laboratory: ALSHS eQAPP Name: ShermanHeights

No Data Review Qualifiers Applied.

Method Blank Outlier Report

Lab Reporting Batch ID: HS20041225

Laboratory: ALSHS

EDD Filename: HS20041225_SEDD

eQAPP Name: ShermanHeights

Method: Matrix:	6020 Soil				
Method Blan Sample ID	k	Analysis Date	Analyte	Result	Associated Samples
MBLK-153336		5/11/2020 4:32:00 PM	LEAD	0.01426 MG/KG	SHSAR/SP17/SS02/0-0.5 SHSAR/SP17/SS02DUP/0-0.5 SHSAR/SP38/SS02/0-0.5 SHSAR/SP39/SS02/0-0.5

Lab Control Spike/Lab Control Spike Duplicate Outlier Report

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225_SEDD Laboratory: ALSHS eQAPP Name: ShermanHeights

No Data Review Qualifiers Applied.

Matrix Spike/Matrix Spike Duplicate Outlier Report

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225__SEDD

Laboratory: ALSHS eQAPP Name: ShermanHeights

Method: 6020 Matrix: Soil								
QC Sample ID (Associated Samples)		Compound	MS %R	MSD %R	%R Limits	RPD (Limits)	Affected Compounds	Flag
SHSAR/SP38/SS02/0-0.5MS (Wet) SHSAR/SP38/SS02/0-0.5MSD (Wet) (SHSAR/SP38/SS02/0-0.5)	LEAD		-15300	-16300	84.00-118.00	-	LEAD	See Note Belov J- (all detects) R (all non-detects)

The spike amount for the MS/MSD was less than one-fourth the concentration of the noted parent sample. As such, no conclusion could be made regarding the accuracy of the spike. The associated QC was acceptable, and no data qualifiers were necessary.

Field Duplicate RPD Report

Lab Reporting Batch ID: HS20041225

EDD Filename: HS20041225_SEDD eQAPP Name: ShermanHeights Method: 6020 Matrix: Soil Concentration (MG/KG) Sample eQAPP SHSAR/SP17/ SHSAR/SP17/ Analyte SS02/0-0.5 (Wet) SS02DUP/0-0.5 (Wet) RPD RPD Flag LEAD 105 106 1 20.00 No Qualifiers Applied

Laboratory: ALSHS

Reporting Limit Outliers

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225__SEDD

Laboratory: ALSHS eQAPP Name: ShermanHeights

No Data Review Qualifiers Applied.

Field QC Assignments and Associated Samples

EDD File Name: HS20041225 eQapp Name: ShermanHeights

	Associated Samples		Sample Collection Date
Field QC SHSAR/SP17/SS02DUP/0-0.5 QC Type: Field_Duplicate			
	SHSAR/SP17/SS02/0	-0.5	4/27/2020 1:00:00 PM

Data Qualifier Summary

Lab Reporting Batch ID: HS20041225 EDD Filename: HS20041225_SEDD Laboratory: ALSHS eQAPP Name: ShermanHeights

No Data Review Qualifiers Applied.

Appendix F

REGULATORY CORRESPONDENCE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7 11201 Renner Boulevard Lenexa, Kansas 66219

SEP 1 1 2018

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 has completed its review of the Draft Summary Memorandum 2017 Long-Term Monitoring Surface Soil Sampling Event for Operable Unit 8. The EPA's comments are enclosed. This letter and enclosed comments are also being emailed. The date of the email serves as the receipt date for Fort Riley, closing the comment period.

Please update the Federal Facility Agreement schedule for the completion of the EPA review period for the draft report. If you have any questions or concerns, please contact me via email at <u>oconnor.daniel@epa.gov</u> or at (913) 551-7868.

Sincerely.

Danny O'Connor Remedial Project Manager Federal Facilities and Post Construction Section Superfund Division

Enclosure

cc: Ms. Laura Percifield, USACE Omaha District (email only) Ms. Margaret Townsend, KDHE (email only)

OU8 Draft 2017 Long-Term Monitoring Surface Soil Sampling Event Report EPA Comments September 2018

General Comment – The EPA agrees with the Kansas Department of Health and Environment's comment made for the Interim Remedial Action Completion Report regarding the elevated lead concentrations detected outside the fenced area. The Army needs to address what action will be taken to either address or further investigate the elevated lead concentrations.

Lead concentrations at three discrete sample locations (SP17, SP38, and SP39) exceeded the remediation goal of 400 milligrams per kilogram (mg/kg) listed in the Record of Decision for Operable Unit 8. The EPA recommends that the Army further characterize lead concentrations surrounding these areas following protocols outlined in the 2003 Superfund Lead-Contaminated Residential Handbook. In general, this would include:

- designating a decision unit, no larger than 100 feet by 100 feet, including and surrounding each of the three sample locations with elevated lead concentrations.
- Collecting a five-point (or aliquot) composite sample from each decision unit. Aliquots should be evenly spaced within each decision unit.
- Submittal of these composite samples for laboratory analysis of lead.

The EPA also recommends that all soil samples be prepared and sieved twice as recommended in the TRW Recommendations for Performing Human Health Risk Analyses on Small Arms Shooting Ranges. The TRW document provides rationale regarding the necessity for sieving samples and provides recommendations regarding the size of screen to be used.

STATE OF KANSAS

DEPARTMENT OF HEALTH AND ENVIRONMENT DIVISION OF ENVIRONMENT CURTIS STATE OFFICE BUILDING 1000 SW JACKSON ST., SUITE 410 TOPEKA, KS 66612-1367

Phone: (785) 296-1660 Fax: (785) 559-4261 www.kdheks.gov

GOVERNOR JEFF COLYER, M.D. JEFF ANDERSEN, SECRETARY

June 28, 2018

Mr. Alan Hynek Directorate of Public Works Environmental Division 407 Pershing Court Ft. Riley, Kansas 66442

RE: Draft Summary Memorandum 2017 LTM Surface Soil Sampling Event Sherman Heights Small Arms Range Site – (SHSAR) Impact Slope, Fort Riley, Kansas

Dear Mr. Hynek:

The Kansas Department of Health and Environment/Bureau of Environmental Remediation (KDHE/BER) reviewed the above referenced document, received on May 23, 2018, and approves the document. Please provide a change page for the title page and an updated electronic copy (CD). Should you have any questions, please contact me by phone at 785-296-1936 or email at margaret.townsend@ks.gov.

Sincerely,

mangaset Townsend

Margaret Townsend, P.G. Unit Chief, Federal Facilities Remedial Section/BER

C: Randy Carlson → Margaret Townsend → File, Fort Riley, SHSAR (C5-031-03037-1) Amer Safadi, EPA- Region 7, electronic Amanda Chirpich, USACE- KC District, electronic

Appendix G

PHOTOGRAPHS

Appendix G – Figures SUMMARY TECHNICAL MEMORANDUM COMPOSITE SURFACE SOIL SAMPLING EVENT SHSAR IMPACT SLOPE, FORT RILEY, KANSAS

Figure 1: Survey laths indicating soil sampling locations are observed along the south perimeter of the SHSAR. Image taken facing East.

Figure 2: Composite soil sampling location observed with a garden trowel for scale. To avoid cross contamination, a different trowel was used for each composite sample, and discarded after.

Appendix G – Figures SUMMARY TECHNICAL MEMORANDUM COMPOSITE SURFACE SOIL SAMPLING EVENT SHSAR IMPACT SLOPE, FORT RILEY, KANSAS

Figure 3: Composite soil samples were collected to depths of 0-0.5'. The samples were collected as close to the surveyed stakes as possible.