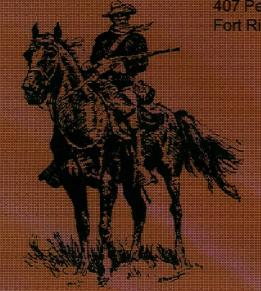


Drait Final Long Term Management and Care Plan

Southwest Funston Landfill Site, OU001 Fort Riley, Kansas March 28, 2011

Department of Army, Headquarters, U.S. Army Garrison
Directorate of Public Works, Environmental Division
407 Pershing Court
Fort Riley, Kansas 66442





DRAFT FINAL LONG TERM MANAGEMENT AND CARE PLAN SOUTHWEST FUNSTON LANDFILL OPERABLE UNIT 001 FORT RILEY, KANSAS

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Document Distribution List/Key Personnel

LIST OF ACRONYMS AND ABBREVIATIONS

CERCLA Comprehensive Environmental Response, Compensation, & Liability Act

DA-FR U.S. Department of Army-Fort Riley

DDL Document Distribution List

EPA-7 U.S. Environmental Protection Agency, Region VII

FS Feasibility Study

HH & E Human Health and the Environment

KDHE Kansas Department of Health and Environment

LTM Long-Term Management

MCLs Maximum Contaminant Levels

msl Mean Sea Level

O & M Operation and Maintenance

RACR Remedial Action Completion Report

RI Remedial Investigation ROD Record of Decision

RPMP Real Property Master Plan SFL Southwest Funston Landfill USACE U.S. Army Corps of Engineers

USEPA U.S. Environmental Protection Agency

1.0 INTRODUCTION

1.1 PURPOSE

This plan was developed in March 2011 to implement the long-term site management and care activities presented in the Remedial Action Completion Report (RACR) for the Southwest Funston Landfill (SFL), dated December 2009. This plan replaces the site remedy's 1996 Operation and Maintenance (O&M) Plan and the 1997 Institutional Controls Plan.

1.2 PLAN RATIONALE

This plan has been developed to define ongoing Comprehensive Environmental Response, Compensation, & Liability Act (CERCLA) activities at the SFL site that are required but are not defined as CERCLA response actions. These long-term management (LTM) and care activities will involve: site access and land use institutional controls; annual inspections and as needed repairs of the landfill vegetative soil cover and the bank stabilization structure; groundwater monitoring until formally terminated, and CERCLA five-year reviews.

1.3 SITE BACKGROUND

The Southwest Funston Landfill covers approximately 120 acres and is located in the southern portion of Fort Riley (Figure 1). It is bordered on the south by the Kansas River, on the north by Well House road, on the west by a former meander bend in the Kansas River and on the east by Threemile Creek. The Southwest Funston Landfill was operated from the mid-1950's until 1981. Typical municipal and industrial refuse from various activities at the Fort Riley military installation were deposited in trenches on the landfill during that timeframe. Some of the industrial wastes were hazardous substances and are thus potential sources of contamination. The landfill was closed in 1983 in a manner approved by the Kansas Department of Health and Environment (KDHE).

A Site Investigation was conducted to characterize the contamination at the Southwest Funston Landfill and a Baseline Risk Assessment to evaluate the potential risk to human health and the environment (HH&E) was completed. The results of the investigation and assessment are presented in the Remedial Investigation (RI) Report, dated October 1993, with revisions dated April 1994. The Feasibility Study (FS) Report, dated April 1994, contains a presentation and analysis of alternatives available to address the potential risks identified in the RI Report. The FS Report was approved by the U.S. Environmental Protection Agency, Region VII (EPA-7) on May 16, 1994 and by the KDHE on May 3, 1994. A Proposed Plan was issued in November 1994 which outlined the remedial

alternatives considered for the Southwest Funston Landfill and identified the preferred alternative with rationale for its selection. The SFL Record of Decision (ROD) listed the components of the selected remedial action and was signed by the U.S. Department of Army-Fort Riley (DA-FR), the EPA-7, and the KDHE in August 1997. The following major components of the preferred remedy presented in the ROD have been implemented at SFL:

- Institutional controls (including signage) to restrict future site uses and prohibit the future use of site groundwater.
- Placement of rock revetment along the northern bank of the Kansas River.
- Repair of the existing soil cover over the landfill so that it meets the criteria of 40 CFR 258.60.
- Semi-annual groundwater monitoring at the site.
- A contingency for future active remediation of the site, if warranted.

1.4 LONG-TERM MANAGEMENT AND CARE ACTIVITIES

The remedy O & M activities at the SFL site have been conducted as part of ongoing measures to maintain the integrity and effectiveness of the evapotranspirative cover and the bank stabilization structure and to monitor the contaminated groundwater to ensure protection of HH & E. In 2009, the remedy remedial action objectives are accomplished and the remediation goals have been met. Therefore, the level of site management and care can be reduced to *de minimis* based on the absence of threats to HH & E posed by hazardous substances at the SFL site. As the site contains buried solid wastes, potential threats to HH & E shall remain as long as the waste is in place.

The USEPA does not define O & M-LTM as a CERCLA response action; therefore, a site with an O & M program for LTM and care following achievement of the "site completion" milestone under CERCLA may still be deleted from the National Priority List, although the site has not achieved the "site close-out" milestone. For sites no longer requiring significant LTM and care activities, a RACR may also document achievement of the "site closeout" milestone under the CERCLA process.

Since the SFL site is a landfill with buried waste, continued LTM and care activities will be required to accommodate the land uses specified in the DA-FR's Real Property Master Plan (RPMP) (e.g., agricultural outlease and other noninvasive activities on the landfill surface), to ensure that water quality in the alluvial aquifer remains less than the Maximum Contaminant Levels (MCLs) and to maintain the bank stabilization structure to prevent erosion. Land use and site access institutional controls will continue to ensure

protection from exposure to the buried wastes that remain in the landfill. These controls are enforced through the RPMP. Although the concentrations of contaminants in the groundwater are less than the MCLs in the Kansas River alluvium in 2009, the restriction on groundwater use will remain, since the site is a landfill with buried wastes.

This final *end use* LTM and care plan for the SFL site replaces the remedy's 1996 O&M Plan and 1997 Institutional Controls Plan. The DA-FR's obligations for site management and care of the landfill following "site completion" ensures that the landfill will continue to not pose a threat to HH & E. The final *end use* LTM and care plan includes the following measures.

Inspections

- Conduct annual inspections (in May) of the riverbank stabilization structure and landfill cover conditions to identify needed repairs. Burn, mow, and/or hay the vegetation (in March) to assist the inspection efforts.
- Observations for signs of landfill methane gas (i.e., distressed vegetation, odors, or bulges in slope from landfill gases) will be documented during annual inspections.

Routine Operation and Maintenance

- Maintain the top layer of the vegetative soil cover to prevent run-on and run-off from eroding or otherwise damaging the landfill cover and to sustain water quality in the Kansas River alluvial aquifer beneath the landfill. Perform *de minimis* (periodic, as needed) cover repair for settlement, subsidence, erosion, lack of or low density of native grass or other dominant plant species, sufficient to permit mowing for hay as dictated by the agricultural outlease, recreational, ecological, and/or non-intrusive/non-habitation activities being considered. Perform whatever cover repair is needed in order to protect HH & E from threats due to the solid waste materials.
- Maintain the riverbank stabilization structure (periodic, as needed) to ensure no landfill debris is exposed and deposited into the Kansas River.
- Keep the landfill in the restricted category in the installation's RPMP. Maintain the SFL site institutional control features. This will preclude drilling of a drinking water well, any building construction, excavation, and other incompatible uses as given in the RPMP. The institutional controls found in the RPMP are considered when each proposed project at Fort Riley undergoes its screening by Fort Riley's National Environmental Policy Act coordinator. The fencing and signage are to be maintained.

Sampling, Monitoring, and Analysis

- Sample the groundwater in March 2012 for the CERCLA five-year review in 2012. If the groundwater concentrations of contaminants remain less than the MCLs in 2012, the groundwater sampling program will be terminated. It will be 15 years post-ROD and 29 years post closure. If the concentrations of contaminants are greater than the MCLs in 2012, the DA-FR will evaluate the risk to HH & E and recommend the appropriate strategy for continued monitoring.
- Monitoring for methane gas in the capped monitoring well will be performed for safety prior to collecting groundwater samples.

Reporting

- Provide routine written reports as appropriate: Groundwater Monitoring Reports, Field Inspection Reports, Maintenance/Repair Reports, and Five-Year Review Reports.
- Provide special written reports as appropriate: Special Field Inspection Reports in
 the case of high water events whenever the Kansas River overtops the crest of the
 riverbank stabilization structure and upper riverbank slope and causes erosional
 damage to the riverbank or attacks the upstream and downstream edges of the
 bank stabilization structure.

The ongoing LTM and care activities will be performed under CERCLA by Fort Riley's DPW-Environmental Division under LTM-O & M contract(s) awarded by the U.S. Army Corps of Engineers (USACE) with oversight by the USACE, the EPA-7, and the KDHE.

1.5 KEY PERSONNEL/DOCUMENT DISTRIBUTION

This Long-Term Management and Care Plan will remain in effect for an undetermined period of time. In order to maintain continuity, a Document Distribution List (DDL) with the names of key personnel is included herein as Table 1. In addition to establishing guidance for the distribution of documents to be prepared in support of the requirements of this plan, the DDL includes the names of current key personnel. The DDL will be updated as changes in key personnel occur. The revised DDL will be placed in this plan as Table 1 and the previous DDL will be archived in Attachment B.

2.0 GENERAL LONG-TERM MANGEMENT AND CARE

2.1 LONG-TERM MANAGEMENT

The operation, inspection, repair and maintenance of the native soil cover, monitoring wells, rock revetment, and signage at the Southwest Funston Landfill shall be in accordance with the instructions contained in this plan and appropriate federal and state regulations. Changed conditions may, from time to time, necessitate minor departures from standing operating instructions. Radical departures from the instructions contained in this plan will be documented in a Technical Memorandum which will be reviewed and approved by the U.S. Department of Army-Fort Riley, the U.S. Environmental Protection Agency, Region VII, and the State of Kansas (the parties to the 1991 Federal Facility Agreement) and incorporated into Attachment B to this plan.

2.2 INSPECTION

Of primary importance in maintaining the native soil cover, monitoring wells, rock revetment, and signage is a systematic inspection program. A complete inspection of the components of the landfill should be made on an annual basis (in May when possible). In addition, inspections should be made after the following significant events:

- (a) Whenever the Kansas River stage at the Fort Riley gage station exceeds an elevation of 1040 mean sea level (msl). In those instances, the Kansas River will overtop the crest of the rock revetment and may cause erosional damage to the river bank or attack the upstream edge of the revetment.
- (b) Instances when the rainfall at Marshall Army Airfield exceeds 3 inches per hour. In those cases, flow in Threemile Creek will exceed the 25-year design stormwater runoff.

2.3 FIELD INSPECTION REPORTS

After each field inspection, a written inspection report will be prepared. The report will include a description of the condition of all landfill features, documentation of any deficiencies noted, and recommendations, schedules and cost estimates for required and elective repairs. The Field Inspection Report will be submitted to the addresses listed in the Document Distribution List within 30 calendar days following completion of the inspection. Copies of the report will be filed in Attachment A to this plan.

2.4 MAINTENANCE AND REPAIR REPORTS

A Maintenance/Repair Report will be prepared whenever these activities are accomplished on the landfill and/or its supporting features. The report will include a description of the work accomplished, a technical appraisal of its success in meeting project goals, and any recommendations for future required/elective work. The Maintenance/Repair Report will be submitted to the addresses listed in the Document Distribution List within 30 calendar days following completion of the field work. Copies of the report will be filed in Attachment A to this plan.

3.0 NATIVE SOIL COVER

3.1 DESCRIPTION OF NATIVE SOIL COVER

The native soil cover encompasses an area of 107 acres and is approximately 2 feet thick. A location plan is included as Figure 1. The Southwest Funston Landfill lies entirely within the 50-year flood boundary (1052.6 msl). Slopes across the landfill are generally less than 1.0% with slopes of 5.0% at the transitions between the additional fill placed during the 1996/1997 cover improvement project and the grade after the 1995/1996 cover repair project. The lower 18 inches is compacted fill material and the top 6 inches is material that will support vegetation. A custom native prairie grass mixture has been established on the landfill surface. The custom native seed mixture is composed of the following grass species:

Species	Percent		
Switchgrass	25.00		
Western Wheatgrass	18.75		
Sideoats Gramma	18.75		
Big Bluestream	12.50		
Little Bluestream	12.50		
Indiangrass	12.50		

A surface runoff outlet channel which drains into a former meander bend of Threemile Creek is located on the northeast side of the landfill. The channel is approximately 500-feet long and 150-feet wide. A minimum 9-inch thick quarry run rock fill has been placed in the channel for protection against erosion.

3.2 INSPECTION

- 3.2.1 Native Soil Cover Inspect the cover to detect:
- Any observable settlement, ponding, sloughing, soil erosion, deep rooted vegetation, rodent damage or any other deleterious conditions.
- Any localized subsidence or saturated areas indicating poor drainage.
- Obstructions along the perimeter of the cover which may prevent flow off of the cover.
- Any signs of distressed vegetation and/or bare spots in the native grass.

- Signs of erosion, rutting, settlement, or soft areas in monitor well access road.
- 3.2.2 Surface Runoff Outlet Channel Inspect the outlet channel for:
 - Evidence of erosion or localized depressions.
 - Excessive sediment or debris deposition, tree sapling growth or any other condition which may prohibit or impede flow of runoff water or otherwise affect the operation of the channel.

3.3 REPAIR

A majority of the repairs for the landfill cover and surface runoff outlet channel will be on an "as-needed" basis. All items found to be damaged during site inspections will be repaired. Repairs which may be required include:

- Filling of depressed/ponded areas resulting from settlement/subsidence of landfill contents.
- Repair of erosional ruts (may also require rock armoring or other protective measures).
- Reseeding of areas covered with silt as the result of flooding.
- Complete repairs to correct damage resulting from unauthorized access and use of the landfill area.

3.4 MAINTENANCE

- 3.4.1 General requirements The following should be performed every third year for the life of the native soil cover or more frequently if annual inspections reveal deficiencies which must be corrected at shorter interval:
 - Removal of tree saplings/tall weeds from the rock armored drainage channel.
 - Filling of animal burrows and trapping/relocation of persistent burrowers.
 - Due to the potential for subsurface fire, the landfill area will be inspected for exposed solid waste materials and deep fissures in the cover, prior to burning the native grass cover.

3.4.2 Native Grass Cover - The native grass within the perimeter of the landfill cover will require special care to develop a good ground cover which promotes evapotranspiration The native grass will be burned, mowed or hayed in March to facilitate annual inspections.

4.0 KANSAS RIVER BANK STABILIZATION

4.1 DESCRIPTION OF ROCK REVETMENT

The revetment along the Kansas River and adjacent to the southern edge of the landfill is a Type "A" revetment with baffles. The revetment is approximately 1200 feet in length with 1 vertical on 1.5 horizontal slopes. The crown of the revetment is at elevation 1038 msl, approximately 7 feet above the low flow stage of the river. On the landward side of the revetment, baffles have been placed every 75 feet extending up to an elevation of 1044 msl, 6 feet above the revetment crown. The revetment is constructed of quarry run stone with a maximum stone size of 700 pounds and not more than 50 percent of the material smaller than 100 pounds.

4.2 INSPECTION OF REVETMENT

Inspect the rock revetment to detect:

- Any observable settlement, sloughing, soil erosion, deep rooted vegetation, weathering, high water damage or any other deleterious conditions.
- Any scour holes undermining the structure on the landward side of the revetment.
- Evidence that the revetment is being flanked at the upstream end.
- Evidence that bank erosion is occurring below the downstream end.
- Evidence of erosion on the opposite bank which may be caused by the revetment.

4.3 REPAIR OF REVETMENT

The majority of the repairs for the revetment will be on an "as-needed" basis. All items found to be damaged during site inspections will be repaired. The original contract specifications will be used as basic guidance in selecting proper materials and techniques for the repairs so that they are compatible with the original design of the revetment. Repairs which might be required include:

- Placement of additional new revetment upstream of the existing if there is evidence that the existing revetment is being flanked.
- Placement of additional quarry run stone at points along the revetment that display evidence of settlement or sloughing and/or freeze-thaw deterioration.

5.0 MONITOR WELLS

5.1 DESCRIPTION

A total of 40 monitoring wells have been installed at the Southwest Funston Landfill site (See Figure 1 for location plan). Six wells were installed in 1983 as required by the landfill closure The risers in these wells have glued joints that render them unusable for chemical monitoring. Twenty wells were installed in 1992-1993 to support the Remedial Investigation. These wells were installed at 8 locations in clusters of two or three wells each. The well installation forms for the 1983 and 1992-1993 wells are included in the Appendices of the Remedial Investigation Report for Southwest Funston Landfill (SFL). Twelve wells were installed in 1994-1995 to support development of the Long-Term Monitoring Plan for the site. Two additional wells were installed in a cluster in 1997 to intercept the groundwater flowing from the SFL to Threemile Creek towards Camp Funston when the creek is in a losing stream condition. During gaining stream conditions, the wells intercept groundwater flowing from Camp Funston towards Threemile Creek and the SFL. The installation forms for those the 1994-1995 and 1997 wells are on file in the Geology Section of the Kansas City District, Corps of Engineers. All monitoring wells installed at Southwest Funston landfill have protective covers and bumper posts. The 1992-1993, 1994-1995, and 1997 wells are equipped with dedicated bladder pumps. Water level sending gages, maintained by the US Geologic Survey are installed in the 1994-1995 wells. Monitoring wells MW-1, MW-3, SFL92-103, SFL91-203, SFL92-701, SFL92-703, SFL92-801, 1915CF92-03, SFL94-06B, and SFL97-901 were abandoned in 2007. Monitoring wells SFL92-302, and SFL92-303 were abandoned in 2009.

5.2 GROUNDWATER MONITORING

- Groundwater monitoring wells SFL92-303, SFL92-401, SFL92-403, SFL92-601, SFL92-603, SFL97-903, SFL94-02A, SFL94-03A, and SFL94-04B will be sampled in March 2012 for the five-year review in 2012. The samples will be analyzed for Target Compound List, Volatile Organic Compounds following USEPA Method SW846-8260B. If the groundwater concentrations of contaminants remain less than the MCLs in 2012, the groundwater sampling program will be terminated. It will be 15 years post-ROD and 29 years post closure. If the concentrations of contaminants are greater than the MCLs in 2012, the U.S. Department of Army-Fort Riley will evaluate the risk to human health and the environment and recommend the appropriate strategy for continued monitoring.
- Monitoring for methane gas in the capped monitoring wells will be performed for safety prior to collecting groundwater samples.

5.3 INSPECTION

Monitoring well components will be inspected as indicated:

- Protective covers for damage and/or signs of vandalism or tampering.
- Concrete pad and protective posts for signs of damage or spalling.
- Weep hole in the protective cover too insure it is clear and free to drain.
- Survey marker mounted in the concrete pad to insure it is securely mounted and legible.
- Locks Presence, integrity, and secured.

DO NOT OPEN PROTECTIVE WELL COVER - DUE TO POTENTIAL PRESENCE OF HARMFUL VAPORS. The condition of the well riser and the serviceability of the bladder pumps will be noted during periodic sampling of the wells by a contractor with an approved Site Safety and Health Plan.

5.4 REPAIR

The majority of the repairs for the monitor wells will be on an "as-needed" basis. All items found to be damaged during the annual inspections will be repaired to insure that the monitoring well network remains intact for subsequent sampling events. Damaged bladder pumps are typically discovered during sampling events and repaired or replaced at that time. The original well installation forms will serve as basic guidance in selecting proper materials and techniques for the repairs so that they are compatible with the original construction. Repairs which might be required include:

• Replacement of protective cover, concrete pad, survey marker, bladder pump or protective posts.

5.5 MAINTENANCE

The following maintenance should be performed every four years for the life of the monitoring wells or more frequently if annual inspections reveal deficiencies which must be corrected:

• Clear tree saplings and high brush within a 25-foot radius of each well.

The following maintenance should be accomplished as dictated by annual inspections:

• Corrosion control and paint protective covers and protective posts.

6.0 INSTITUTIONAL CONTROLS

6.1 DESCRIPTION OF INSTITUTIONAL CONTROLS

The Southwest Funston Landfill is entered in the restricted category in the U.S. Department of Army-Fort Riley's Real Property Master Plan (RPMP). This will preclude drilling of a drinking water well, any building construction, excavation, and other incompatible uses as presented in the RPMP. The institutional controls found in the RPMP are considered when each proposed project at Fort Riley undergoes its screening by Fort Riley's National Environmental Policy Act coordinator. The SFL site institutional control features including fencing and signage are to be maintained.

6.2 INSPECTION OF SIGNPOSTS/ACCESS GATE

The signposts and access gate will be inspected as indicated:

- Access gate for serviceability/ease of operation.
- Access gate lock presence/serviceability/in locked position.
- Access gate for signs of bypassing.
- Signposts for presence/legibility/serviceability/observability.

6.3 REPAIR OF SIGNPOSTS/ACCESS GATES

The majority of the repairs for the signposts and access gate will be on an "as-needed" basis. All items found to be damaged during site inspections will be repaired. The Institutional Controls Plan will serve as basic guidance in selecting proper materials and techniques for the repairs so that they are compatible with the original construction. Repairs which might be required include:

- Replacement of access gate/signs due to damage or future approved changes in wording of signs.
- Installation of bumper posts to prevent bypassing of the access gate if the inspection indicates that is occurring.

6.4 MAINTENANCE OF SIGNPOSTS AND ACCESS GATE

The following maintenance should be performed every four years for the life of the institutional controls or more frequently if annual inspections reveal deficiencies which must be corrected:

• Clear tree saplings and high brush which restricts observability of posted signs.

The following maintenance should be accomplished as dictated by annual inspections:

- Corrosion control and paint sign posts and access gate.
- Replace signs if they become illegible.

7.0 REFERENCES

CFR, 1992. Code of Federal Regulations (CFR), Title 40, Part 258, Subpart F, as amended at 57 Federal Register 28626, June 26, 1992.

EE/CA, 1993. Engineering Evaluation/Cost Analysis (EE/CA) for Remedial Investigation/Feasibility Study, Southwest Funston Landfill, Fort Riley, Kansas, July, 1994.

FFA, 1991. Federal Facility Agreement (FFA), USEPA Region VII, State of Kansas and U.S. Army, Fort Riley, Docket No. VII-90-F-0015, February 28, 1991.

FS, 1994. Feasibility Study (FS) Report for Remedial Investigation/Feasibility Study, Southwest Funston Landfill, Fort Riley, Kansas, April 1994.

KAR, 1994. Kansas Administrative Regulations (KAR), Agency 28, Article 29, Part 4, effective October 24, 1994.

PP, 1994. Proposed Plan (PP), Southwest Funston Landfill, Operable Unit 001, Fort Riley, Kansas, November 1994.

RI, 1994. Remedial Investigation (RI) Report for Southwest Funston Landfill, Fort Riley, Kansas, October 1993, Revised April 1994.

ROD, 1995. Record of Decision (ROD), Southwest Funston Landfill, Operable Unit 001, Fort Riley, Kansas, June 15, 1995.

RACR, 2009, Remedial Action Completion Report (RACR), Southwest Funston Landfill, OU001, Fort Riley, Kansas December 2009.

SSPs, 2008. Site Specific Plans (SSPs) for Groundwater Monitoring Activities, Southwest Funston Landfill, Fort Riley, Kansas, March 7, 2008.

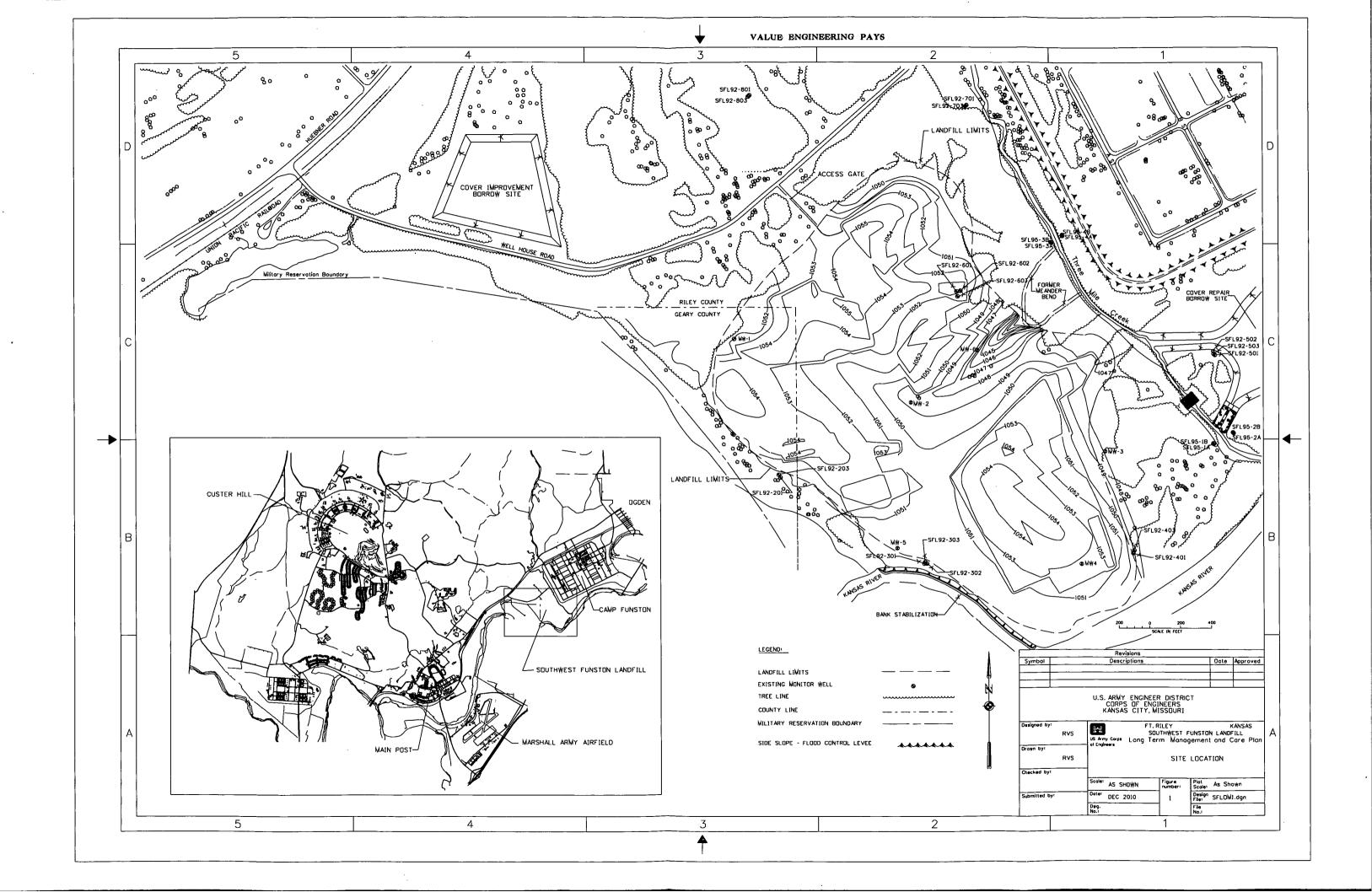
Table 1

DOCUMENT DISTRIBUTION LIST

LONG TERM MANGEMENT AND CARE PLAN SOUHTWEST FUNSTON LANDFILL FORT RILEY, KANSAS March 29, 2011

	DOCUMENT DISTRIBUTION		
Document Title >>	Tech	Inspect	Maintenance
·	Memo	Report	Report
LTMC Plan Section >>	Para 2.1	Para 2.3	Para 2.4

AGENCY/KEY PERSONNEL	NUMBER OF COPIES		
DIR ENVIRONMENT AND SAFETY PLANNING RESTORATION DIV ATTN IMNW-RLY-PWE ANDREA AUSTIN 1970 2ND STREET, CAMP FUNSTON FORT RILEY, KS 66442-6016	5	5	5
Mr. Amer Safadi, Remedial Project Manager U.S. Environmental Protection Agency, Region VII Federal Facilities/Special Emphasis Branch, Superfund 901 N 5th Street Kansas City, Kansas 66101	2	2	2
Mr. Joe Dom, Environmental Scientist Kansas Department of Health and Environment Bureau of Environmental Remediation 1000 SW Jackson, Ste 410 Topeka, Kansas 66612-1367	1	1	1
Commander U.S. Army Engineer District, Kansas City ATTN: CENWK-PM-ED (Mr. Richard Van Saun) 601 East 12th Street Kansas City, Missouri 64106-2896	1	1	1



ATTACMENT A

INSPECTION REPORTS MAINTENANCE AND REPAIR REPORTS

ATTACMENT B

TECHNICAL MEMORANDUM HISTORICAL DOCUMENT DISTRIBUTION LISTS