Huntington Distri...

Formerly Used Defense Sites Newsletter

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Rising to the Challenge:

CLEANING UP FORMERLY USED DEFENSE SITES

Under the Formerly Used Defense Sites (FUDS) Program, the U. S. Army Corps of Engineers (USACE) is cleaning up hazardous waste sites in various sites in West Virginia and Ohio. Success stories abound, including cleanup efforts at the former West Virginia Ordnance Works (the former TNT production site in Point Pleasant, WV), Dolly Sods (near Elkins, WV), the Yeager Air National Guard Site (in Charleston, WV), and the former Plum Brook Ordnance Works (in Sandusky, OH).

The FUDS Program

The Department of Defense (DoD) is committed to correcting environmental damage caused by its activities. Designed to accomplish this is the Defense Environmental Restoration Program (DERP), which was established by two important laws. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 and the Superfund Amendments and Reauthorization Act (SARA) of 1986 gave DoD the authority for certain cleanup activities at former DoD sites in the United States and its territories. The cleanup of FUDS sites is part of the DERP program. FUDS are those properties

Information on a successful defense site cleanup under the FUDS program can be found on page 4

that the Department of Defense once owned or used, but no longer controls. These properties can range from privately owned farms to National Parks. They also include residential areas, schools, colleges, and industrial parks. The FUDS program includes former Army, Navy, Air Force, or other defense agencies' properties, and almost 9100 FUDS sites have been identified since the program began in 1984.

The USACE Role

DoD's manager for the FUDS program is the USACE, whose goals with the FUDS program include:

- Identification, investigation, and cleanup of contamination from DoD hazardous substances
- Detection and disposal of unexploded ordnance
- Demolition and removal of eligible structurally-unsafe buildings and structures located on the property owned by the state, a municipality, or native corporation in Alaska.

Site Eligibility

The FUDS program requires that a site must have been owned by, leased to, possessed by, or otherwise under the jurisdiction of the DoD. The hazardous environ-

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AN ENVIRONMENTAL TRANSFORMATION:
from

Ordnance Works to Wildlife Area

The former West Virginia Ordnance Works (WVOW) TNT production site covers approximately 8,323 acres in Mason County, West Virginia. The entire site was originally placed on the U. S. Environmental Protection Agency's (USEPA) National Priority List (NPL) of the most hazardous waste sites in the U. S. in 1983. In 1994 the hazardous waste area, or NPL boundary, was reduced to 2,704 acres located mainly on the McClintic Wildlife Management Area (owned by the state of West Virginia) through the combined efforts of the U. S. Army Corps of Engineers (USACE); federal, state, and local environmental authorities; private contractors; and local citizens.

The WVOW site is approximately 50 miles northwest of Charleston, 41 miles northeast of Huntington, and six miles north of Point Pleassant, West Virginia, on the left descending bank of the Ohio River. From 1941 to 1946, WVOW manufactured TNT from toluene, nitric acid, and sulfuric acid. By-products of the manufacturing process included TNT, DNT, and organics that have been released to groundwater, soil, and surface water and sediments. Prominent site types include TNT manufacturing areas, wastewater sewer lines, and wastewater ponds.

Cleanup Background

In 1981 and 1982, Preliminary Assessments and Site Inspections identified

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two contaminated areas. The installation originally planned to address the sites as two areas (Operable Units). To expedite environmental restoration, however, the two areas were divided and additional areas were added for a total of thirteen Operable Units. As a result of remedial investigation and feasibility study activities, restoration actions that were selected included capping contaminated soils, capping two ponds and a reservoir, constructing a groundwater extraction and treatment system, and building three ponds for wetlands mitigation. The term "capping" refers to solving an environmental problem by covering the affected areas with an earthen cover. In 1988, contaminated soil was capped in the TNT Area. Caps for the Ponds and Reservoir were completed in 1992. In 1993, USACE began investigating and studying options at the TNT Manufacturing Areas and the Sellite Plant and Vicinity. The installation also began Operation and Maintenance and Long-Term Monitoring for the Burning Grounds Area, the Red Water Reservoir, and the Yellow Water Reservoir and vicinities.

In 1994, the site management plan for the installation was completed. Operation and Maintenance and Long-Term Monitoring for the Burning Grounds Area, the Red and Yellow Water Reservoirs and Vicinities continued and remedial design activities were completed for the Groundwater Extraction and Treatment System. Remedial investigation activities continued for the other areas and Expanded Site Investigations (ESI's) were initiated. Sampling and remedial design activities continued at the Wetlands Mitigation Area. The USACE removed 546 tons of hazardous material from the TNT Manufacturing Area and backfilled open pits and manholes with clean gravel.

Major Accomplishments at the WVOW

The USACE coordinates restoration activites with various Federal, state, county, and community agencies. In 1994, the installation formed a Technical Review Committee, which has since transformed into a Restoration Advisory Board (RAB). The RAB conducts periodic meetings and partnering review sessions. By working together in the partnering sessions, three major issues were identified:

An article about the RAB can be found on page 6

* **Reduction of the boundaries of the WVOW site:** Local landowners were concerned that the value of real estate near WVOW had decreased and that they were not able to purchase additional private property included as part of the NPL site. As a result of subsequent partnering sessions and the conbined efforts of the stakeholders, the boundaries were changed to reduce the overall size of the NPL site by 67.5 percent from 8,323 acres to 2,704 acres, and it boosted public support for the WVOW environmental restoration program.

* **Trichloroethene Cleanup:** In 1994, the Huntington District USACE conducted a site inspection of the area near the Point Pleasant Municipal Water Supply and confirmed the source of contamination to be a former Plant that operated at the site after WVOW was closed. Following site inspection findings, the USEPA took the lead in remediating trichloroethene contamination. The USEPA is pursuing all potentially responsible parties to recover cleanup costs and, as a result, no Department of Defense funds are expected to be used for remediation or cost recovery work at this site.

* **Demolition of powerhouses, open pits, and manholes:** Abandoned structures at the site posed a potential threat to human health due to asbestos contamination and physical safety problems. The Huntington District USACE accelerated field work to demolish two powerhouses and fill over 100 manholes and open pits.

Restoration Progress

Initially, RAB meetings were held on a bimonthly basis at the Mason County Library. Currently, meetings are held as needed to exchange information. The meetings focus on informing the Point Pleasant community of environmental restoration activities at the WVOW site that are currently in progress and those planned in the future. In addition, team meetings involving the USACE, USEPA, and the West Virginia Division of Environmental Protection are held on a regular basis to discuss schedules and deadlines of planned environmental restoration activities at the WVOW. Some current activites by the USACE include:

-Supplemental AOC Investigations (Jun/Aug 99)
-OU8/9 Direct Push Sampling (Jul 99)
-OU8/9 Pump Well Test (Aug 99)
-ESI8 Dump Area Remedial Action (Jul - Sep 99)
-ENV06 Wetlands Mitigation Construction of Wetland/Aquatic Habitat (current)
-OU10 FInal Proposed Plan (Aug 99)
-OU11 Final Record of Decision (Aug 99)
-OU12 Final Record of Decision (Aug 99)
-Five-year Review Meeting with USEPA (Aug 99)

Some current activities recently completed include:
-OU1 Burning Grounds Cap, Additional Sampling (Jun 99)
-ESI5/6 Refueling Depot and Maintenance Area Underground Storage Tank Confirmation Investigation (Jun 99)
-Design contract for Corrective Action on Groundwater Pump and Treatment System awarded
-ESI3 Tract 21 additional field sampling (Jun 99)

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mental conditions must have arisen as a result of past DoD activities. A FUDS site may include manufacturing facilities which were owned or leased by DoD, but operated by contractors. FUDS sites also include National Guard and Reserve facilities where property accountability at one time rested with the DoD. Further, it includes sites where the DoD had a documented presence and sites that were used for the disposal of DoD materials or waste where the installation responsible for the waste is permanently closed. The following sites are **not** eligible for cleanup or reimbursement:

* Sites outside U. S. jurisdiction
* Sites where current owners have used facilities such as underground storage tanks or buildings, or have expended funds to clean up contamination or remove unsafe debris
* Sites for which the DoD component that owned or used the site has accepted full restoration responsibility
* United Services Organization sites
* Civil Works sites
* Cemeteries
* Sites for which no records are available

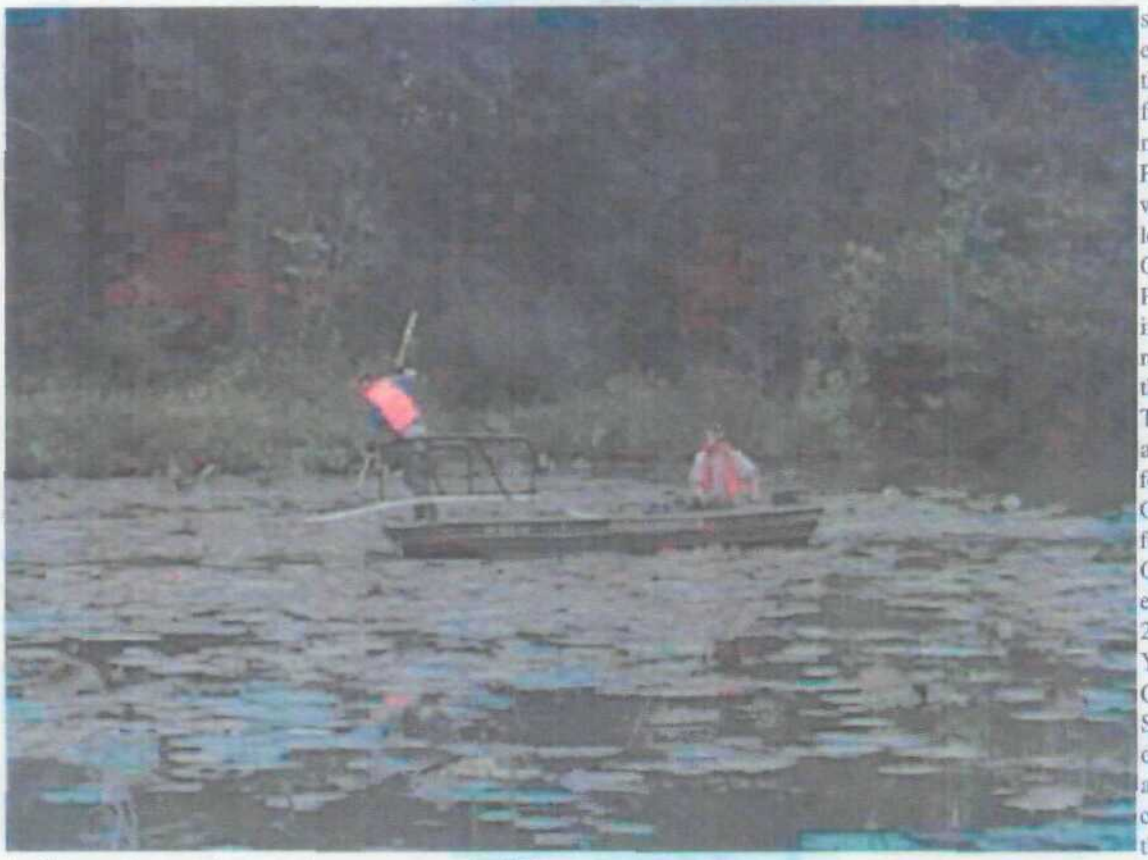
Types of Projects

There are many different types of projects within the DERP-FUDS program. Projects at a FUDS site fall within one or more of the following categories:

* **Hazardous, Toxic, and Radioactive Waste:** Cleanup and removal of hazardous substances. Projects in this category include removal of underground and above-ground storage tanks, drums, and electrical transformers. These projects are called containerized hazardous, toxic, and radioactive waste projects. Other projects in this category include removal of soil or groundwater contaminated with hazardous substances, projects for removal of other hazardous substances or wastes, and projects for cleanup of environmental problems associated with contaminated landfills.

* **Building Demolition and/or Debris Removal:** Demolition and removal of structurally unsafe buildings or towers and removal of unsafe debris.

* **Ordnance and Explosive Waste**: Identification and removal of abandoned ordnance and explosive waste such as bombs, bullets, and rockets. Also included are projects for removal or remediation of explosive-contaminated soil and chemical warfare material.



The Current Challenge

The FUDS program at the Huntington District currently includes four active properties: Dolly Sods Maneuver Area, the former Plum Brook Ordnance Works, the former West Virginia Ordnance Works, and the Yeager Air National Guard Site. Within each property are numerous projects, focusing on specific areas and contamination. Dolly Sods was an ordnance removal project and is mostly complete. The only remaining actions are approval of the Final Removal Report and creation of a long-term monitoring plan. The long term monitoring plan will account for the shifting of trails due to erosion and hikers and the possibility of finding more ordnance. The former Plum Brook Ordnance works property is located near Sandusky, Ohio. Activities at Plum Brook include investigations and removal actions for the remediaton of TNT contamination, as do those at the former West Virginia Ordnance Works. The former West Virginia Ordnance Works is expected to last until 2012. Currently, the Yeager Air National Guard Site is under a Site Investigation to determine if there is any remaining DoD contamination. After these sites have been remediated, they will be monitored for evidence of further DoD contamination that was not found before the projects began. More sites will undoubtedly surface and be scheduled for participation in the FUDS Program, in which they will be remediated and monitored for additional risk to humans and the environment. DoD wants to take responsibility for its own contamination and hopefully finish all remediation within an acceptable time frame. As they clean up their contamination, the environment becomes safer for everyone.

The Success of Dolly Sods

Many people visit Dolly (Dahle) Sods, located in Grant, Tucker, and Randolph counties in northeastern West Virginia, for various activities, including hiking, fishing, camping, picnics, and hunting, but not many are aware of a danger at the site: unexploded ordnance. Dolly Sods is operated by the U. S. Fish and Wildlife Service and is open to the public at all times. The Dolly Sods Ordnance Removal Project was conceived as a result of a feasibility study in 1991 when ordnance was found in the West Virginia Maneuver Area, which had been used for mountain training and maneuvers during World War II by the Department of the Army. Even though the area was searched and cleared by military Explosive Ordnance Disposal teams after the war, at least 21 pieces of ordnance have been found in recent years.

Public Impact

The impact on the public of this project is quite large. It is estimated that between 45,000 and 76,000 people visit Dolly Sods Wilderness annually. The project has significantly reduced the amount of ordnance posing a hazard to the public in the most widely used areas. In the Wilderness Area, twelve high explosive 81mm live mortars and two high explosive 60mm live mortars were found and safely detonated; one high explosive 60mm live mortar, one high explosive 4.2 in. live mortar, and six chemical 4.2 in. live mortars with FS smoke filler were detonated in the North Area. There were nineteen 4.2 in. inert mortars found and safely detonated in the North Area. There were 108 pounds of OE scrap removed from the Wilderness Area and 1,043 pounds were removed from the North Area. Without this removal project, the material would have posed a threat to the public visiting the area. In fact, at least one accident has occurred in the area that was ordnance related. When Wallace Dean, a current Huntington District employee and team member, was hunting on the site as a young teenager, one of his friends found a live piece of ordnance and picked it up. As he was putting it back, the ordnance exploded, causing Wallace severe damage in his legs. Without prompt medical attention, Wallace would not walk today, but he was brought out, treated, and able to walk within one year.

Now that the cleanup effort has concluded, there are fewer pieces of ordnance on site along the trails by which most people travel within Dolly Sods and their risk of becoming harmed is less.

Working with the Community

Community involvement was increased by use of public meetings, news releases and interviews with the radio and newspaper. The Huntington District and Huntsville Center participated in a media day to explain the project actions and answer questions the media and public might have. Also, a public information repository is maintained in the Forest Service office in Elkins, West Virginia to allow the public direct access to the project files. These actions have helped to maintain a good relationship with the public and provide an open forum for questions.

Partnering In Action

The Huntington District has also made all efforts to streamline the cleanup process to complete the Dolly Sods Ordnance Works project as soon as possible. The Huntington District and the Huntsville Center worked with the Forest Service to evaluate the West Virginia Maneuver site for the area most likely to contain ordnance that posed a threat to the public, which was designated as Dolly Sods. While the West Virginia Maneuver Area contains 2,181,000 acres, Dolly Sods encapsulates only 16384.5 acres within that area. 10,215 acres of Dolly Sods were designated as the "Wilderness" Area and the remaining 6,169.5 acres were the "North" Area. Since it would be impractical to clear most of the areas within Dolly Sods because the majority of the acreage is heavily wooded, 259.84 acres out of the project area were cleared, including trails, campsites, and cabin areas. Because the acreage was reduced, contract costs were limited to $1.73 million.

When developing the Environmental Assessment for the Wilderness Area, the North Area was regarded as another phase of the project, so the Endangered Species Range Maps used also incorporated the North Area. Using the information for the Wilderness Area by reference, the team was able to expedite the Environmental Assessment process through the North Area. This resulted in reward and completion of the North Area removal action at least one year ahead of schedule. In addition, partnerships with United States Fish and Wildlife Service, United States Forest Service, West Virginia Department of Natural Resources, the Huntsville Center, and the removal contractor (Human Factors Applications) allowed for streamlined processes to improve the efficiency and effectiveness of the removal actions. Before the project began, the Forest Service arranged to mark the trails on which the removal contractor would be working. Due to this, there was no time lost between when the contract and the contractor began.

Also, due to the presence of Cheat Mountain Salamanders, a threatened species, the workplan stipulated that a Forest Service Representative inspect the area in which ordnance was found to move them to a safe location.

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However, the Forest Service office is at least two hours away from the site (both by car and hiking to the area) and the contractor could not leave the ordnance site unprotected until the unexploded ordnance (UXO) was detonated. Sometimes this would require one of the members of the removal team to guard the UXO overnight, resulting in higher cost because of overtime and loss of that person the next day due to them needing sleep. Also, none of the Forest Service employees had the OSHA training required to enter an area where ordnance has been located. The partners worked together and decided to train one of the removal contractors so that they could act as the Forest Service Representative and assure that the workplan was followed.

Partnering was also in effect when the project was immobilized due to inclement weather. A partnering meeting was held to discuss expectations and solve any problems before the project was remobilized. This allowed for cultural resources training, endangered species training, and team building. Roles and responsibilities were also defined, which allowed a smooth transition into the Dolly Sods North Area Removal with everyone doing their part to support the action. By teaming with these agencies, the cleanup effort was improved; without the team mentality the project would not have been as successful.

These accomplishments can be used to help others across the country. A significant aid to the project was the partnering spirit, with everyone working together to achieve a common goal. By establishing a partner mentality, projects will progress smoother with fewer problems. Team building exercises helped to strengthen the partnering mentality and establish strong relationships between all those involved. Another helpful exercise was defining the roles and responsibilities of each partner and voicing opinions about those responsibilities. By defining these, each partner knew what was expected of him/her and on whom they could count for certain things; no one made any assumptions about who was supposed to do something and it helped assure that things would get done. By creating a solid team with defined roles and responsibilities, a project succeeds without problems caused by lack of communication and unanswered expectations.

Yeager Air National Guard Area B

BACKGROUND

The Yeager Airport in Charleston, West Virginia is the location of a small, 5-acre site that was formerly used by the Air National Guard from 1948 through 1971 for vehicle maintenance and fuel storage. The site had several maintenance and storage buildings and 5 underground storage tanks, ranging in size from 2,000-gallon to 12,000-gallon, which were installed for use in the daily operations. The Yeager Airport now owns the site.

UNDERGROUND STORAGE TANK REMOVAL PROJECT

The U.S. Army Corps of Engineers, Huntington District, removed the underground storage tanks (USTs) between October 5 - November 6, 1998. During the removal of the final UST, petroleum contamination was evident in the excavated soil backfill and in water that accumulated in the excavation pit. Initial sample analysis results showed that the soil and water contained petroleum contaminants above state regulatory limits. All soil in the pit was removed to the virgin rock face, and disposed of at a state-approved landfill. Water accumulated in the excavation pit, and was pumped out twice and disposed. Water did not re-enter the pit prior to placement of backfill material and site restoration. Confirmatory soil and water samples taken prior to backfill placement revealed that the contaminant levels were within state approved limits for petroleum contaminants. Subsequently, the West Virginia Division of Environmental Protection (WVDEP) on October 28, 1998 issued a *Confirmed Release Notice to Comply* to the Corps, which required further investigation and preparation of a report.

The Huntington District performed a field investigation on December 2, 1998, to gather information to prepare the Initial Site Characterization Report. Sensitive areas, such as water wells, streams and watercourses, sumps and manholes, and adjacent properties were investigated. No evidence of environmental damage due to potential release from the UST site was observed. The report was forwarded to the WVDEP on December 10, 1998.

The WVDEP reviewed the report and analytical data, determined that the investigation was complete, and notified the Corps on February 3, 1999, that no further action was required.

SITE INVESTIGATION PROJECT

There is the potential that Area "B" may be contaminated from the former vehicle maintenance activities. The Louisville District Corps of Engineers initiated fieldwork for a Limited Site Investigation (SI) of vehicle maintenance area on June 2, 1999. The SI is scheduled for completion by September 30, 1999. Depending upon the results of the SI, additional studies may be necessary to determine the extent of any DoD contamination that may be present.

RESTORATION ADVISORY BOARDS:
PUBLIC INVOLVEMENT SUCCESS STORIES

Restoration Advisory Boards (RAB's) are established at active, closing, realigning, or formerly used Department of Defense (DoD) sites where there is sufficient community interest in environmental restoration activities. The RAB is DoD's approach to involving the community, installation representatives, the U.S. Environmental Protection Agency, state regulatory agencies, and local officials in the restoration activities.

Who are RAB Members?

The RAB is primarily an advisory board designed to act as a focal point for the exchange of information between the U. S. Army Corps of Engineers (USACE) and the local community regarding the local restoration activities. A key component of this program is to promote public participation in the decision-making process, and ensure the public is provided accurate information regarding the cleanup process. RAB membership is usually balanced and reflects the diversity of interests within the community, including homeowners, business persons, local environmental groups, and low-income and minority populations. At closing installations, a representative of the Local Reuse Authority is usally a member of the RAB.

Responsibilities of the RAB Community Members

The communinty members of the RAB have responsibilities to the interests, concerns, or groups they represent and to the community as a whole. The expectation is that they will serve in a voluntary capacity, without compensation. The RAB usually meets quarterly or bi-monthly and the community members usually serve a one- to two-year term.

The RAB at West Virginia Ordnance Works (WVOW)

Until 1994, only three public meetings had been held to distribute information to the local community about restoration activities at WVOW. In late 1994, a newly-formed RAB began holding public meetings every other month. Currently the WVOW RAB meets every two to three months or as needed at the Mason County Library or the National Guard Armory in Point Pleasant. At these meetings, the Huntington District USACE provides the status of the environmental cleanup. For the first time since restoration work began at WVOW, a foundation has been laid for an exchange of information with the public, community leaders, and regulatory agencies involved in the decision-making process.

The RAB has determined various short- and long-term goals to guide them through the restoration process. The short-term goals include: (i) to provide a forum for discussion among stakeholders (federal and states regulatory agencies, the public, and other affected or potentially responsible parties) concerning the environmental cleanup program at the former WVOW, (ii) to increase participation among stakeholders regarding proposed cleanup remedies, and (iii) to focus on the public's concern and questions by open discussion at RAB meetings. Long-term goals include: (i) to provide a forum for discussion between the public and the parties (i.e., U.S. Environmental Protection Agency, the West Virginia Environmental Protection Agency, and the UAACE) concerning the issues raised in the Record of Decision, (ii) to provide for effective communication with the participation of of the public regarding the Record of Decision, (iii) to effectively resolve public concern for the long-range cleanup and development of the McClintic Wildlife Area, and (iv) to continue to open dialogue among the stakeholders, parties, and public regarding all aspects of the cleanup program.

The RAB at Plum Brook Ordnance Works (PBOW)

Interested in keeping the community informed, the Huntington District USACE joined with community members in and around Sandusky, Ohio to form a RAB. Since January 1997, the RAB has held bi-monthly meetings, at which presentations of reports are made and sometimes tours are given. The RAB members

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are concerned with maintaining a community presence in the decision-making process of the project. Issues recently addressed by the RAB include: (i) involvement in the Technical Assistance Public Participation (TAPP) Program, which would provide funding to allow for technical support to the RAB; (ii) restoring the PBOW site to its original or native vegetation, which would be decided during site restoration; and (iii) the development of a web site that would allow the community to become more informed and involved in the project. While the project is presently under Site Investigations and Groundwater Sampling, the RAB is becoming fully involved in the project and will remain so until the project's completion.

WVOW RAB Members

John Musgrave, *Community Co-Chair*
Buster Riffle, *Alternate Community Co-Chair*
William Danchuk
Nancy Eads
Darlene Haer
Gene Haer
Dave Jackson
Raymond Musgrave
Rebecca Stein
Rodney Wallbrown

PBOW RAB Members

Mark Bohne, *Community Co-Chair*
Margaret Kingsley, *Alternate Community Co-Chair*
Starr Truscott
Robert Hermes
Lisa Ohlemacher
George Parker
Richard Pitsinger
David Speer
Carla Ontko
Gilbert Steinen
Lee Yeckley
Janet Bohne

Plum Brook Ordnance Works

The former Plum Brook Ordnance Works (PBOW) encompasses 9,010 acres and is located four miles south of Sandusky in Erie County, Ohio. The site was acquired by the Department of Defense in 1938; in the early 1940s the U. S. Army contracted with the Trojan Powder Company to manufacture 2,4,6-trinitrotoluene (TNT), dinitrotoluene (DNT) and pentolite. Operating from 1941 to 1944 and producing over 900 million pounds of these materials, PBOW was placed on standby status in 1945 while decommissioning and decontamination activities were conducted by the Department of the Army. After the activities were completed in September 1945, the property was transferred to the Ordnance Department, the War Assets Department, and GSA before the National Aeronautics and Space Administration (NASA) purchased 6,500 acres of the site.

The PBOW Project was divided into thirteen Areas of Concern for investigation of possible contamination: TNT Areas A, B, and C; Red Water Ponds; Underground Wastewater Flumes; Burn Grounds; Waste Lagoons; Ash Pits and Power Plants; Toluene Tank Areas; Rail Car Unloading Area/Sellite Area; Acid Areas; Pentolite Area; Garage and Maintenance Area; TNT Rail Car Loading Areas; and Sitewide Groundwater.

The primary goal of the PBOW remedial program is to effect cleanup of the site to agreed-upon levels using the most practicable methods in a cost- and time-effective manner. Accomplishment of this program requires establishing effective relationships among all parties involved: NASA, United States Army Corps of Engineers (USACE) Huntington District, USACE Nashville District, USACE Louisville District, United States Environmental Protection Agency (USEPA) Region V, Ohio EPA (OEPA), and other state agencies, in addition to the community members of the surrounding area. To maintain the relationship with the community, a Restoration Advisory Board was formed and has been maintained since January 1997. Representatives from the USACE, IT Corporation, USEPA, OEPA, and the RAB contractor, International Consultants Incorporated, attend these bi-monthly meetings to make presentations and discuss issues to help keep the community fully involved in the project. There is also an Administrative Record maintained at the Firelands College Library, which serves two purposes: (1) it contains the full body of documentation which provided the basis for the selection of a response action; and (2) it provides a vehicle for public participation. All the documents are available for public review.

For more information on any of these projects, contact:
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