

ATTACHMENT 7
DECISION DOCUMENT OUTLINE

DECISION DOCUMENT/STATEMENT OF BASIS OUTLINE

1. PURPOSE

This decision document describes the selected action to _____ (state action) _____ at the _____ (name of site) _____ at _____ (installation) _____ chosen in accordance with the CERCLA as amended by the SARA, the NCP, RCRA, and AR 200-1, as applicable.

Give a brief description of the site, including DSERTS number, type of operation that caused a release, dates the site operated, and the hydrogeologic setting. Also, briefly describe the nature and extent of contamination and how the site poses a risk to human health and the environment. State what action/remedy has been selected and how the selected action will eliminate or reduce the risk to human health and the environment.

This removal/interim remedial/remedial action alternative was selected by _____ (installation) _____, with support from _____ (State or EPA) _____.

2. SITE RISK

Give a brief description of the results of any risk assessments or risk considerations at the site. Discussion should, at a minimum, address exceedence of state and Federal maximum contaminant levels for the given media of concern, exposure pathways, known or potential health or ecological effects of contaminant, and overall risk which could result from the contamination at the site if no remedial action were taken. Do not include relative risk site evaluations as a measure of risk for a decision document.

3. REMEDIAL ALTERNATIVES

Briefly describe the remedial alternatives considered, the selected remedial alternative, and provide an explanation/rationale of why the remedial method was selected and the expected goals or long-term effectiveness of the remedy. State negotiated cleanup levels/goals and any planned remedial action operations and monitoring.

If desired, or deemed necessary, reference any technical documents supporting this decision, i.e., "The alternative(s) summarized here are described in the remedial investigation and feasibility study (RI/FS) report dated _____ which should be consulted for a more detailed description of all the alternatives".

4. PUBLIC/COMMUNITY INVOLVEMENT

At a minimum, describe what steps were taken to involve the public in the selection of the remedy. Unless an emergency situation exists, as defined by the removal action criteria in the NCP, part 300.415(b) (2), the public is afforded an opportunity to review and comment on any proposed remedial action.

5. DECLARATION

See attached declaration statements. Choose the declaration statement that best describes the site and situation.

6. APPROVAL AND SIGNATURE

Re-state the selected alternative, the total cost of the action and the appropriate approval authority for the action. The appropriate approval authority is based on the cost of the action described in the decision.

- a. The ACSIM, approves all DDs greater than \$6 million..
- b. The MACOM commander approves DDs between \$2 million and \$6 million.
- c. The Installation Commander approves DDs less than \$2 million.

DECLARATION STATEMENTS - SECTION 5

1. When the selected remedy satisfies the statutory preference for treatment as a principal element, by treating at least the principal threat(s) posed by the site, the declaration should state:

"The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable."

2. When the selected remedy for the site involves little or no treatment to reduce toxicity, mobility or volume of contaminants, that is, treatment is not utilized to address the principal threat(s) posed by the site, CERCLA requires a statement explaining why such a remedial action is not chosen. The declaration in this case should state:

"The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable for this site. However, because treatment of the principal threats of

the site was not found to be practicable [or "within the limited scope of this action"], this remedy does not satisfy the statutory preference for treatment as a principal element of the remedy." This must be followed by the rationale for this finding based on the specific factors used to determine that treatment is either impracticable or not within the limited scope of this action. In addition, a brief statement that past or future operable units will meet the statutory preference for treatment should be included when appropriate.

3. If the remedy will leave hazardous substances on-site above health-based levels, the Declaration should include the following:

"Because this remedy will result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment."

4. If the remedy will not leave hazardous substances on-site above health-based levels, the Declaration should include the following:

"Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five-year review will not apply to this action".

EXAMPLE
DECISION DOCUMENT FOR A
SOIL REMOVAL

COOLVILLE ARMY DEPOT,
ALABAMA

1. PURPOSE

This decision document describes the selected action to remove contaminated soils at the Acid Pond site at Coolville Army Depot, Alabama. This action was chosen in accordance with the CERCLA as amended by the SARA, the NCP, RCRA and AR 200-1, as applicable.

The Acid Pond site (DSERTS number CVAD-13) contains two unlined ponds surrounded by earth berms located within a heavily wooded area. The ponds were in operation from 1949 until 1973. It is reported that the ponds received acid wastes from batteries, shell de-rusting operations, and approximately 17,000 mustard-filled projectiles (155mm) from a reconditioning operation in 1955. A tributary to Lake Eric drains to the south along the base of the slope west of the ponds. Lake Eric is the water supply for Coolville Army Depot.

Elevated levels of arsenic, cadmium, chromium, lead, selenium in soils, surface water and ground water near the site indicate that contamination is migrating from the Acid Pond site. Given the close proximity of the Acid Pond site to the installation water supply (Lake Eric), the decision was made to remove the contaminated soils (the source of contamination to the surface water and ground water), regrade the site, and monitor the ground water.

This removal action alternative was selected by the Army with support from the Alabama Department of Environmental Management and the Region IV, U.S. Environmental Protection Agency (EPA).

2. SITE RISK

Investigation of this site began in 1982. At those times low levels of zinc and nitrite/nitrate was detected in ground water and chromium and lead were detected in downgradient surface-water samples. In 1989, maximum concentrations of arsenic, cadmium and chromium in soil from the site exceeded risk-specific dose values for carcinogens. Ground water at the site also exceeded state and federal maximum contamination levels for chromium, lead and selenium. In 1994, continued investigation determined that concentrations of contaminants increased in surface water and ground water.

Area drainage from the Acid Pond site occurs primarily by surface runoff into a tributary west of the ponds that drains south into Lake Eric. Lake Eric is located approximately 800 feet from the Acid Pond site. Potential receptors of contamination from the Acid Pond site are installation personnel (from the water supply provided by Lake Eric); employees working near the site, cattle, deer and small game animals, as well as aquatic life.

3. REMEDIAL ALTERNATIVES

Remedial alternatives proposed from the Corrective Measures Study and the Interim Remedial Action Study for the Acid Pond site were:

-- No Action. This action does not prevent the continued migration of contaminants from the soil to the surface water and groundwater, therefore, the potential risk of exposure through the installation water supply remains. Potential exposure to installation personnel working near the site and exposure to the ecology also remains.

-- Institutional controls (site fencing and monitoring). This action would provide adequate protection of facility personnel working near the site and to several ecological factors, however, since the source of contamination would remain as well as the migration pathways, the installation water supply remains a potential exposure pathway. Potential exposure to aquatic life would also remain.

-- Multi-layer cap and institutional controls (site fencing and monitoring). This action would provide adequate protection of facility personnel working near the site and large land animals. This action would decrease water infiltration at the site and possibly reduce leachate generation. Since the source of contamination would remain, the installation water supply remains a potential exposure pathway. Potential exposure to aquatic life would remain but would be reduced. Monitoring would have to be long-term due to the proximity of the Lake Eric water supply.

-- Soil removal and limited institutional controls (monitoring). This action would consist of removing and disposal of contaminated soil and regrading the Acid Pond site. Institutional controls would be limited to monitoring the groundwater and surface water. This action would eliminate the source of contamination and thereby be protective of any exposure to humans, animals and aquatic life. With the removal of the source, the groundwater contaminant concentrations should naturally attenuate.

The alternative selected for remediation of the Acid Pond site is soil removal with limited institutional controls. As the site characterization, risk assessment and study of alternatives have been completed for this site; it is planned that this action will be the final remedial action for this site. Cleanup levels in soil of 1 ppb for chromium, 3 ppb for cadmium and 5 ppb for arsenic as well as 5 ppb for lead and selenium were negotiated with the EPA and the State of Alabama. Groundwater and surface water monitoring will occur annually for three years after completion of the removal.

4. PUBLIC/COMMUNITY INVOLVEMENT

Coolville Army Depot has a Community Relations Plan. In accordance with the Community Relations Plan, a public notice will be placed in the local newspaper announcing the remedial activities to be completed at the Acid Pond site.

5. DECLARATION

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this removal action, and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable. Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five-year review will not apply to this action.

6. APPROVAL AND SIGNATURE

The selected alternative for the Acid Pond site is soil removal and limited institutional controls. The total cost of this action is estimated at \$1 million. The appropriate approval authority for this action is the Coolville Army Depot Installation Commander.

APPROVED BY:

W. H. JONES
Colonel, CM
Commanding