

US EPA ARCHIVE DOCUMENT

RCRA Showcase Pilot - Region 6

Remington Arms Company, Lonoke, Arkansas

Remington Arms is an EPA Region 6 - Arkansas Department of Environmental Quality (ADEQ) Corrective Action Strategy (CAS) pilot project. Region 6 has initiated an aggressive program to assist our states in streamlining the RCRA Corrective Action Process. Over the course of the last three years Region 6 with significant input from stakeholders has developed a risk-based guide that can significantly accelerate corrective action at Resource Conservation and Recovery Act (RCRA) facilities. The Region 6 CAS is a flexible guide that can be used to enhance state specific corrective action rules and regulations by highlighting and promoting the use of flexibility found in our national corrective action policy. Under this new approach entire facilities will be evaluated as a whole, investigations and cleanups prioritized on a “worst first” basis to better focus resources (time and money), and corrective action driven by risk based decision making which accurately and realistically reflect current and future land use scenarios and beneficial use of resources.

Facility Name - Remington Arms Company
Lonoke, Arkansas

The Remington Arms Company owns and operates a manufacturing facility producing rimfire, centerfire, and shot shell sporting ammunition at this location. The manufacturing processes include electroplating, metal forming and fabrication, metal finishing, plastic processing, chemical explosive manufacturing, and ammunition assembly operations. Dupont a previous owner retains responsibility for site investigation and cleanup. This facility is new in the corrective action process and will be a start to finish pilot project (very limited site data at the onset). The pilot is being conducted under a letter of agreement (LOA) between the State and facility. Remington is a GPRA baseline facility.

Pilot Project Participants - Remington Arms and Dupont facility representatives, Arkansas Department of Environment Quality (ADEQ) staff, and EPA Region 6 CAS team members.

Oversight of the Remington CAS Pilot - Oversight of this pilot will be carried out by EPA Region 6 CAS team members. The ADEQ will coordinate meetings and provide technical comments.

Key Contacts -

Region 6	Richard Ehrhart	214.665.6765
ADEQ	Daniel Clanton	504.682.0834

Innovations of the CAS Pilot Program -

- ! Use of innovative technology - XRF screening technology for metals determination; rapid delineation and characterization based upon established DQOs
- ! Use of ecological screening checklists to determine ecological receptors & habitats concerns up front
- ! Development of site conceptual model to identify data gaps based on available information, enable development of site specific performance standards and establish DQOs prior to beginning major characterization work
- ! Use of Letter Agreement as an alternate authority to describe the roles and responsibilities of each party to conduct site investigation and cleanup; streamlines administrative procedures using the CAS guidelines
- ! Communication strategy developed to include frequent calls and informal face to face meetings as necessary for rapid decision-making

- ! Risk-Based - ensures protection of human health and the environment
- ! Performance-Based - performance standards and data quality objectives drive site investigations and cleanup, flexibility for the owner/operator in achieving performance standards
- ! Prioritizes Corrective Action - utilizes screening tables to prioritize corrective action efforts based on risk, worst first approach, focuses time and money
- ! Realistic evaluation of current and future site and resource use
- ! Team members empowered to make decisions, increases trust, increases timeliness
- ! Facility wide approach
- ! Acknowledges cost as a function of remediation
- ! Remedial selection balanced between treatment, engineering controls and institutional controls
- ! Recognizes and promotes phased remediation

Stakeholder Support for the CAS - EPA Region 6 sought extensive stakeholder input from states, industry, environmental groups, EPA HQs, other EPA regions, etc. during the development of the CAS. This pilot project is being conducted cooperatively with the state and facility. The Remington facility is conducting a door to door water well survey in the surrounding properties to acquire additional ground water data and promote awareness of the community of the corrective action process. This will promote early and continued involvement of nearby stakeholders and provide public participation at key decision making stages. A public notice will be done when a remedy selection is made, and the State will develop a remedial action decision document for review and comment by stakeholders.

Benefits of the CAS - The CAS is a useful approach to corrective action for facilities that are willing to commit resources up front to manage risk at their sites. Since the CAS takes a site-wide approach to corrective action, this may result in more efficient remedy solutions. Provides a relatively easy administrative approach to conduct corrective action. Promotes a cooperative/results based working arrangement (face to face meetings, gained trust reduces review/oversight needs, allows for use of existing data meeting DQOs, etc.) Promotes early discussion of critical issues and expectations (conceptual site model, DQOs, screening criteria, performance standards, etc). Allows flexibility to achieve results (sampling programs, screening approaches, focus on what's important, recognizes that changes may be necessary throughout the process, etc.). Resource utilization can be better predicted (dollars, personnel).

Proposed Project Milestones - The Scoping meeting for the Remington pilot was held on January 23, 2001. The CAS site investigation work plan was submitted on March 26, 2001. Ecological field screening was conducted on May 2-4, 2001; completed ecological checklist. Field investigation and sampling began in June 2001 utilizing both conventional and innovative XRF techniques. Field investigation results are expected by August 2001. The facility will update conceptual site model with August results, and compare XRF techniques with lab data, and develop additional phase II sampling plans as needed. Complete risk evaluation report and draft CA725/750 by September. Remedy proposal and the risk management plan for the site is expected by the Fall 2001.

Measuring and reporting the Progress of the CAS Pilot - EPA Region 6 CAS team members have developed a Virtual Office, which is an information-sharing extranet site, to be used by all CAS pilot project participants. Authorized users of the VO will be able to track and monitor the progress of the pilot project. Non pilot project participants will have access to pilot summary reports and schedules through an Region 6 public web page.

Application of the CAS for other projects - The CAS was developed as a tool for the states to use to expedite corrective action. The concepts in the CAS can be applied for facilities that are just beginning corrective action, facilities that are not making progress with their investigations, or for facilities that need

assistance in remedy proposals. The CAS emphasizes the use of existing data, and does not require additional reporting. For states that have corrective action regulations (generally provide cleanup numbers), the CAS offers an alternative process for completion of corrective action.