

US EPA ARCHIVE DOCUMENT

October 2007

DuPont Remington Arms Facility

Facility: Remington Arms Company

Location: Lonoke, Arkansas

Status: Corrective action complete at this interim status facility. Ready for Reuse Determination issued on January 27, 2005. RAU Determination issued on October 10, 2007.

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Summary

This interim status facility has been used for ammunition manufacturing since 1969. Soils were found to have lead contamination due to waste management practices prior to 1980 and RCRA regulation. In 1993, DuPont sold almost the entire site to a New York venture capital firm that bought Remington Arms. DuPont retained ownership of the closed surface impoundments that were located on the property as well as any liability associated with any solid waste management units (SWMUs). The parties agreed to an "Environmental Liability Services Agreement" (ELSA) as part of the Asset Purchase Agreement for the property. This agreement specified DuPont's obligations and responsibilities to fund the investigation and remediation of the site. In 2000, the parties agreed with the Arkansas Department of Environmental Quality (ADEQ) to address corrective action using EPA Region 6's Corrective Action Strategy (CAS). By implementing a flexible approach and streamlining regulatory requirements, corrective action was completed in just over 3 years. On January 27, 2005, ADEQ and EPA issued a Ready for Reuse Determination to DuPont and Remington. By participating in EPA Region 6's CAS program, DuPont estimates that it saved seven years and \$5 million when compared to the traditional corrective action process.

Background

This 1,116-acre site is located about 20 miles east of Little Rock, Arkansas in a rural, agricultural area. DuPont originally constructed this facility and operations began in 1969. Remington Arms Company (Remington), formerly a subsidiary of DuPont, produces rimfire, centerfire, and shot shell sporting ammunitions at the

facility. These ammunitions are manufactured through processes such as electroplating, metal forming and fabrication, metal finishing, plastic processing, chemical explosives manufacturing, and ammunition assembly operations. DuPont/Remington Arms applied for and received interim status at this facility. In 1993, DuPont sold the majority of the property and assets of the Remington Arms Company to Clayton, Dubilier, and Rice, a New York venture capital firm. DuPont retained ownership, however, over the site's nine surface impoundments, which had all been closed under interim status regulations. As part of the Asset Purchase Agreement, the parties also agreed to an "Environmental Liability Services Agreement," which stated that DuPont would retain responsibility for funding clean up and liability for any SWMUs existing on site. The ELSA established a threshold limit of \$5 million from which Remington funded environmental projects that predated the sale of the company. After the threshold limit was met, DuPont directly funded all environmental projects that predated the sale. DuPont worked in collaboration with Remington on the investigation and cleanup activities, while managing the respective contracts.

In this matter, DuPont is represented by Sporting Goods Properties, Inc. (Sporting Goods), which is a DuPont subsidiary. As a result of decades of ammunition manufacturing on the site, soils with high lead concentrations existed on the property. In November 2000, Sporting Goods and Remington entered into a letter agreement with Arkansas DEQ to use EPA Region 6's Corrective Action Strategy (CAS) to address the RCRA corrective action requirements at the site. By using the CAS, the parties were able to streamline the regulatory requirements in order to facilitate the remediation and achieve a more timely cleanup. CAS is a facility-led corrective action approach that accelerates investigations and cleanups through practical performance-based/risk-based approaches. The first scoping meeting occurred in January 2001, and final corrective action activities were completed in March 2004.

Remediation Activities

DuPont continues to maintain the remedies (caps) and monitor seven surface impoundments, which had been closed under interim status prior to the sale of the rest of the property. Two impoundments were clean closed and require no additional maintenance/monitoring.

In addition, in consultation with Remington, DuPont funded and managed the investigation and cleanup of all SWMUs identified on the site. Two phases of investigation were conducted, which identified fourteen SWMUs. No further action was required at nine of these SWMUs. At the other five SWMUs, lead-impacted soils were remediated to industrial standards. Corrective action activities included excavation and treatment of approximately 6,080 cubic yards of soils. Testing suggested that groundwater/surface water pathways were not impacted. In January 2005, ADEQ and EPA Region 6 jointly issued Remington Arms a Ready for Reuse Determination that conditions on the property were

protective of human health and the environment based on its current and planned future use as a small arms manufacturing facility. All necessary institutional controls are in place to ensure the ongoing protectiveness of the remedy and, therefore, the property has been determined to be Ready for Anticipated Use by EPA Region 6.

The time frame from project initiation to completion of remedial activities was just over three years. By participating in EPA Region 6's CAS program, DuPont estimates that it saved seven years and \$5 million.

Revitalization Activities

Continued use is ongoing on 385 acres of the property, as Remington Arms continues to manufacture ammunitions at the facility. The remaining 731 acres are managed as wildlife habitat. Ecological enhancements have been made, such as the construction of a 20-acre moist soil impoundment for waterfowl habitat in cooperation with Ducks Unlimited.

At present, Remington Arms Company is working with EPA's Resource Conservation Challenge (RCC) program in Region 6 to develop a pilot project to recycle its wastewater sludge and baghouse dust which contain lead. Remington is currently talking to smelters to see if the material is marketable.