



Gas Instruction Area-USACE Investigations

BACKGROUND

The U.S. Army Corps of Engineers (USACE) is the Department of Defense organization that is responsible for environmental restoration of properties that were formerly owned by, leased to, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense. Such properties are managed under the Formerly Used Defense Sites (FUDS) Program. The former Schilling Air Force Base (AFB) was designated as a FUDS site in 1991 and certain areas within the former base were identified as requiring further investigation under the FUDS Program.

USACE identified the Gas Instruction Area, which is located in the southwestern portion of the former Schilling AFB, as a project within the former base that required further investigation. The Gas Instruction Area has been classified to be a Military Munitions Response Program (MMRP) site within the FUDS Program. MMRP sites are established to address unexploded ordnance, discarded military munitions and associated material, and chemical warfare material (CWM).

The Gas Instruction Area has been identified as potentially having CWM in the form of small amounts of chemical agents used for training purposes. A detailed history of the Gas Instruction Area, including information on chemical agents, is included in a separate fact sheet available online at: http://www.nwk.usace.army.mil/projects/schilling/factsheets/SchillingGasInstructionHistoryFactSheet_Final.pdf.

MMRP sites, which include the Gas Instruction Area, follow the process outlined in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Congress enacted CERCLA in 1980 in response to the threat of sites known or suspected to be of an environmental concern.

CERCLA PROCESS

The CERCLA process, from site evaluation to response complete, is outlined below and illustrated in the figure below. The purpose of each step is briefly defined below with a summary of the CERCLA step as it relates to the Gas Instruction Area.

EVALUATION

Preliminary Assessment:

The Preliminary Assessment (PA) phase consists of collecting readily available property information and a property visit to determine if potential contamination exists on the property due to former activities. USACE conducted a site visit to the former Schilling AFB on October 23 and 24, 2002, to evaluate site conditions. The site visit is documented in the ASR, which was completed in May 2003, and meets all the requirements of a PA. The findings of the 2003 ASR included a possible CWM concern at the Gas Instruction Area.

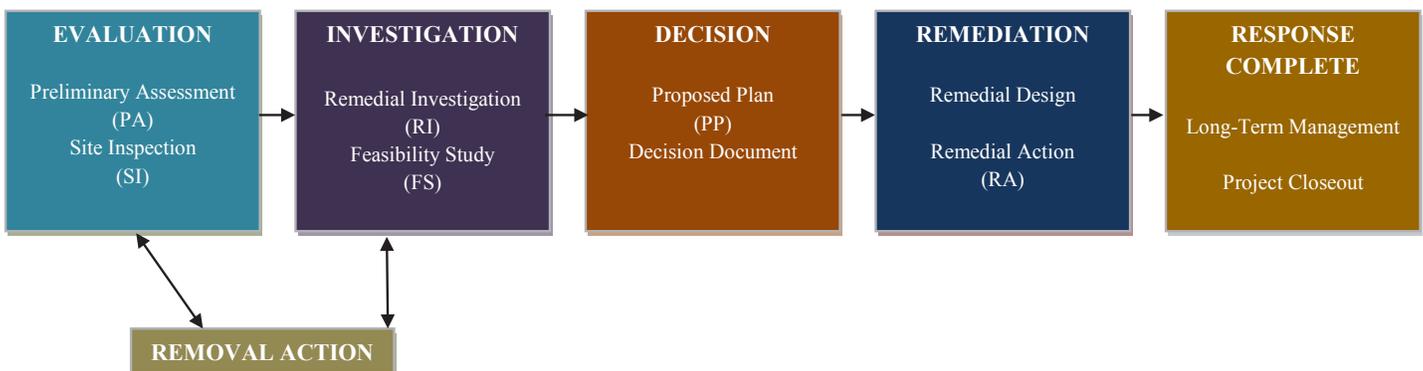
Site Inspection:

The Site Inspection (SI) phase is executed when there is information that a potential release has occurred on a property. It involves confirming and supplementing PA-phase information to determine whether there is a need for a remedial or removal response. This phase commonly involves limited environmental sampling to address a relative risk as it relates to human health and the environment. In 2010, an SI was completed for the Gas Instruction Area, which recommended further investigation.

INVESTIGATION

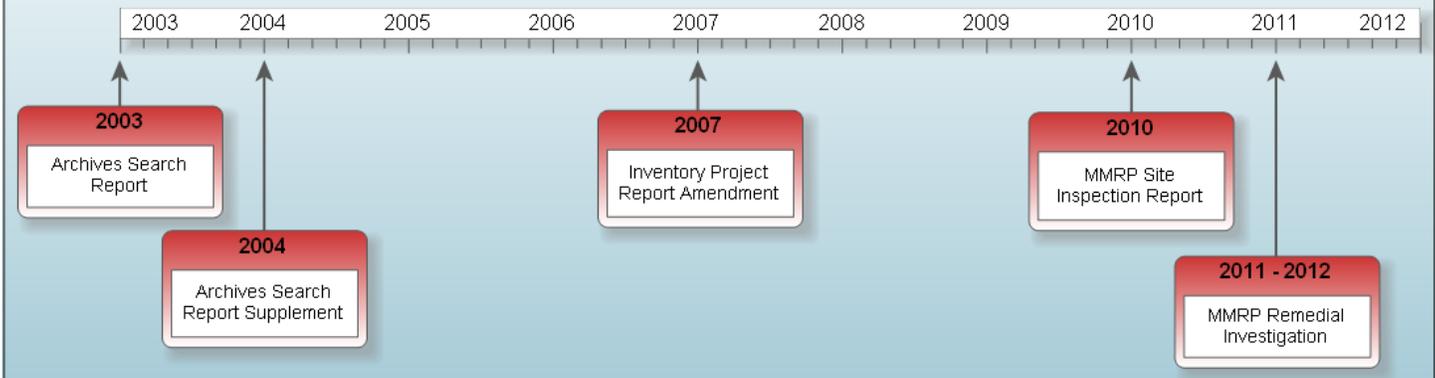
Remedial Investigation:

The Remedial Investigation (RI) phase involves collecting field data to characterize the nature and risk identified



CERCLA Process and Remedial Phases

USACE Activities Related to Gas Instruction Area



during the SI. The Gas Instruction Area is in the RI phase. In addition, subsequent phases are planned for the Gas Instruction Area.

Feasibility Study:

A Feasibility Study (FS) is conducted if remedial actions are required at a site due to contamination or risk. The FS develops and evaluates appropriate remedial alternatives and recommends a remedy for a site.

Removal Actions are typically short-term actions with limited objectives and are appropriate when site-specific conditions indicate an imminent threat to human health, safety, or the environment. Following removal actions, a site will continue through the remedial response process.

Remedial Actions (also known as the **Remedy**) are generally long-term response actions that reduce the risks associated with releases or threats of releases of hazardous substances. Remedial actions are not necessarily time critical and may be incorporated throughout the time frame of the response action.

REMOVAL ACTION

Removal actions, before the remedial action, are sometimes needed to eliminate imminent threat to human health, safety, or the environment. Removal actions can occur any time throughout the PA, SI, or RI phases of the CERCLA process. Removal actions fall into three categories: emergency removal action, time critical removal action, and non-time critical removal action. There is currently no known need for any of these actions at the Gas Instruction Area; however, evaluations will be made throughout the RI.

DECISION

Proposed Plan:

The Proposed Plan (PP) is the first step in remedy selection. The PP summarizes the remedial alternatives evaluated in the FS and specifies the preferred cleanup method. The public is offered the opportunity to comment on the PP prior to a final decision.

Decision Document:

Public comment on the proposed remedy is considered prior to preparing a Record of Decision (for National Priority List projects) or Decision Document (for non-National Priority List projects) that specifies the final cleanup remedy. The Gas Instruction Area is not a National Priority List project.

The National Priority List is the list of national priorities among the known or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories.

REMEDIATION

Remedial Design:

The Remedial Design phase is used to develop engineering documents for the selected remedy.

Remedial Action:

The Remedial Action (RA) phase implements the selected remedy method. The RA is a long-term remediation action selected for the site.

RESPONSE COMPLETE

Long-Term Management:

During the completion phase of a remedy, long-term management and monitoring of the RA is completed to ensure the RA is operating to meet its remediation objective and remains protective of human health and the environment.

Project Closeout:

Once the objectives of the remedy are met, the site is closed out.

GAS INSTRUCTION AREA PATH FORWARD

The evaluation phase of the CERCLA process has been completed for the Gas Instruction Area. As a result of these initial studies, historical documentation was found indicating the potential presence of Chemical Agent Identification Sets (CAIS) and decontamination exercises at the site. CAIS are described in a separate fact sheet providing a history of the Gas Instruction Area.

Soil testing during the 2010 SI showed no chemical agent or agent breakdown products in the soil at the Gas Instruction Area. As a result, there are no unacceptable risks to human health and the environment from exposure to chemical agents or agent breakdown products. However, a geophysical survey identified 19 buried metallic items. Based upon site history and the magnetic signature of the items, an investigation is planned to determine whether these items represent CAIS.

The Gas Instruction Area is currently in the RI phase of the CERCLA process. During the RI, the underground buried metallic items will be safely identified and disposed. Field work associated with investigating the underground buried metallic items is expected to last less than a month and will be conducted during the summer of 2012. The RI phase includes, but is not limited to, preparation of work plans prior to field work, the actual field work, verifying field data, and preparing an RI report. The entire RI phase is anticipated to take 2 years to complete.

The assessments completed so far indicate a low probability of encountering chemicals associated with CAIS. The procedures for responding to a finding have been designed to be fully protective of the public and site workers.

PUBLIC AWARENESS

Public awareness is an important part of the USACE FUDS Program. Public awareness activities are required during particular phases of the CERCLA process. As part of the RI, USACE will develop a Public Involvement Plan that documents concerns identified during community interviews and provides a description of community relations activities planned at the site.

USACE developed a website available at <http://www.nwk.usace.army.mil/projects/schilling/index.cfm> to provide the public with information about the Gas Instruction Area. The website includes a site history and site location maps. Site documents, including the 2010 SI report and fact sheets, also are available on the website. USACE will update the website periodically to keep the public informed of planned activities at the Gas Instruction Area.



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USACE is planning to issue a supplemental fact sheet for the Gas Instruction Area upon finalizing the RI work plan. The fact sheet will outline the planned field work activities.

For more information about the Gas Instruction Area, please contact the USACE, Kansas City District Public Affairs Office at:

(816) 389-3486

or by email via:

<http://www.nwk.usace.army.mil/pa/>