December 5, 1997

Mr. Jerry Wooley
E.H.S. Administrator
Hallmark Cards, Inc.
4901 Select Products Drive
Leavenworth, Kansas 66048

RE: Consent Order Case No. 94-E-0190
   Comprehensive Investigation/Corrective Action Study

Dear Mr. Wooley:

The Kansas Department of Health and Environment (KDHE) finalized the Corrective Action Decision detailing the remedial action to be implemented at the Hallmark Cards, Inc. facility located in Leavenworth, Kansas. This activity was performed pursuant to the Comprehensive Investigation/Corrective Action Study (CI/CAS) Consent Order Case No. 94-E-0190 executed on August 25, 1994.

The Secretary's issuance of the July 23, 1997, Declaration for Corrective Action Decision adequately satisfies the requirements for the referenced Consent Order, therefore KDHE considers that Hallmark Cards, Inc. has fulfilled the terms of the referenced Consent Order. KDHE appreciates the professional and conscientious manner in which Hallmark Cards, Inc. has conducted its operations and demonstrated its cooperation with the Agency.

Sincerely,

Gary R. Mitchell, Secretary
Kansas Department of Health and Environment

pc: Pat Casey, KDHE Legal
John Monroe, KDHE BER

Division of Environment, Bureau of Environmental Remediation
Forbes Field, Building 740, Topeka, KS 66620-0001

Telephone: (785) 296-1673
FAX: (785) 296-1686
This concurrence form is for you review and comment on the attached document. The attached document is a PHOTO COPY. The original has been forwarded to Legal Services and will be attached before concurrence by the Secretary of Health and Environment.

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<tr>
<td>Project Manager</td>
<td>John Moore</td>
<td>7/7/97</td>
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<tr>
<td>Unit Chief</td>
<td>B. Ellis</td>
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<tr>
<td>Section Chief</td>
<td>E. Smith</td>
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<td>Bureau Manager</td>
<td>L. Johnson</td>
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<td>Attorney</td>
<td>J. Lyons</td>
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<td>Legal Office Supvr.</td>
<td>J. Andrews</td>
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<td>Director of Legal</td>
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<td>Director of Env.</td>
<td>E. Smith</td>
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<td>General Counsel</td>
<td>D. Green</td>
<td>7/22/97</td>
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<td>Secretary</td>
<td>G. Miller</td>
<td>7/23/97</td>
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IN THE MATTER OF: Hallmark Cards, Inc Site Select Products
Leavenworth, KS
Declaration of Corrective Action Alternative Decision

CASE NUMBER: 94-E-0190

PLEASE RETURN TO OFFICE OF LEGAL SERVICES
7/23/97 Signed Corrective Action Alternative Plan to Legal
DECLARATION OF CORRECTIVE ACTION ALTERNATIVE DECISION

SITE NAME AND LOCATION:

Hallmark Cards, Inc. Site
Northwest ¼ of Section 18
Township 9 South, Range 23 East
Leavenworth County, Kansas

STATEMENT OF BASIS AND PURPOSE:

The Final Corrective Action Decision document presents the corrective action selected for the Hallmark Cards, Inc. Site located in Leavenworth, Kansas. The Hallmark Cards, Inc. Site consists of groundwater contaminated during former operations of the facility by benzene, methylene chloride, toluene, and vinyl chloride. The selected corrective action for the Site was developed in accordance with guidelines from the Kansas Department of Health and Environment (KDHE) Bureau of Environmental Remediation State Cooperative Program and the Federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund amendments and Reauthorization Act of 1986 (SARA). The corrective action for the Site was developed on the basis of the documents and information contained in the Administrative Record File for the Site. The Administrative Record file is available for review at KDHE Bureau of Environmental Remediation Central Office located in Topeka, Kansas and the Leavenworth Public Library.

DESCRIPTION OF SELECTED REMEDY:

KDHE has determined that the selected remedial action alternative, described and evaluated in the Draft Corrective Action Decision, satisfies or meets the criteria established by the State Cooperative Program and will be protective of human health and the environment.

The remedial action selected for the Hallmark Cards, Inc. Site includes the following:

- **Natural Attenuation and Biodegradation with Confirmation Monitoring** - Contaminant concentrations in ground water would be monitored as the VOCs degrade in the environment through biodegradation and natural attenuation with periodic ground water sampling and analysis of thirteen (13) ground water monitoring wells. All samples would be analyzed for EPA Method 8260.
DECLARATION:

The selected remedial action alternative is protective of human health and the environment, attains State, Federal, and local requirements that are applicable or relevant and appropriate to this remedial action and provides cost-effective response.

In selecting and declaring this remedial action, KDHE believes implementation of the remedial action will have a beneficial effect on health and the environment in preventing uncontrolled migration of contaminants from the Site.

DATE

Gary R. Mitchell
Secretary

Attachment: Final Corrective Action Decision
KDHE CORRECTIVE ACTION DECISION

HALLMARK CARDS, INC. SITE
LEAVENWORTH, KANSAS
July 15, 1997

FINAL

Prepared by:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Bureau of Environmental Remediation
Forbes Field, Building #740
Topeka, Kansas 66020
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## ATTACHMENTS

- Figure 1: Site Location Map
1.0 PURPOSE OF FINAL CORRECTIVE ACTION DECISION

The primary purposes of the Final Corrective Action Decision (CAD) are to: 1) summarize key information from the Comprehensive Investigation (CI) and Corrective Action Study (CAS); 2) describe the remedial alternatives evaluated within the CAS report; 3) identify and describe the remedial action selected by KDHE; and 4) document activities performed by KDHE to foster public participation and input into the selection of the remedy for the site. To encourage public comment, an availability session was conducted on June 25, 1997, at 7:00 p.m. at the Leavenworth Public Library. The public also could submit written comments to KDHE during the 30-day public comment period from June 7, 1997 to July 7, 1997.

Work performed during the CI/CAS process followed the terms outlined in a Consent Order between Hallmark Cards, Inc. and KDHE executed on August 25, 1994. CI and CAS reports were prepared by OHM Remediation Services Corp. on behalf of Hallmark Cards, Inc. The public was invited to review and comment on the technical information presented in the CI and CAS reports and other documents contained in the Administrative Record file. The Administrative Record file included all pertinent documents and site information which formed the basis for supporting the KDHE preferred remedial alternative. Administrative record files were available for public review and copying at the following locations:

Kansas Department of Health and Environment
Bureau of Environmental Remediation
Forbes Field, Building #740
Topeka, Kansas 66620
CONTACT: John Monroe
(913) 296-8986

Kansas Department of Health and Environment
North East District Office
800 West 24th Street
Lawrence, Kansas 66046
CONTACT: Daniel Kellerman
(913) 842-4600

Leavenworth Public Library
417 Spruce Street
Leavenworth, Kansas 66048
CONTACT: Mrs. Buker
(913) 682-5666
2.0 SITE BACKGROUND

2.1 Site Location

The Hallmark Cards, Inc. Site (Site) contains the Select Products Drive Facility and is located at 4901 Select Products Drive in Leavenworth, Leavenworth County, Kansas. The Site is within the southwest quarter of the northwest quarter of Section 23, Township 9 South, Range 23 East. Figure 1 is a map illustrating the facility location.

The facility was constructed in 1962 on a former tree nursery. It currently occupies 26.7 acres surrounded by light industrial, commercial, and residential developments. An abandoned railroad right-of-way borders the property to the east with overgrown undeveloped land beyond it. To the west, the Site is bordered by commercial businesses and the US73/K7 Highway. Commercial Street and Eisenhower Road border to the north and south, respectively. Residences are directly to the south of the facility as well as to the east, beyond the railroad right-of-way and a stream.

2.2 Physical Setting

The Site is located in a horseshoe-shaped topographic depression opening to the south and bisected by an intermittent stream draining to the south. The stream drains to a tributary of Seven Mile Creek, which discharges to the Missouri River approximately two miles east of the site. The Site is on the western portion of the topographic depression. Topographic relief is very shallow to flat on the western upland portion of the Site that steps down to the east.

2.3 Site History

The Select Products Drive Facility is part of Hallmark Cards, Inc. The facility manufactures bulk paper products and merchandise bags for delivery to other Hallmark production facilities and retail stores.

In June, 1983, Black & Veatch performed an environmental investigation at the Site and submitted a report entitled "Report on Field Investigation and Analysis for Ground Water Quality Evaluation." The investigation involved the installation of four monitoring wells and seven soil borings. Analytical results indicated concentrations of toluene at 626 micrograms per liter (ug/l), isopropyl alcohol at 1,056 ug/l, and various other alcohols and acetates in the ground water.

In April 1984, Black & Veatch completed an additional investigation at the site and submitted a report entitled "Report on Ground Water Quality Evaluation." The ground water monitoring network was expanded by five additional wells and confirmed the presence of solvents, alcohols and acetate contaminants in ground water above the federal drinking water Maximum Contaminant Levels (MCLs).

As part of a letter agreement formulated at the April 27, 1984 meeting with Hallmark, KDHE and
Black and Veatch, ground water withdrawal well OW-10 was installed in August 1984. A pump test indicated that the radius of influence of the withdrawal well was approximately 50 feet, and pumping did not appear to affect the two wells furthest down gradient, OW-8 and OW-9. Annual ground water monitoring was also initiated at the facility as part of the agreement.

In October 1989 and February 1990, Black & Veatch conducted Phase I and Phase II Hydrogeologic Investigations, respectively, for the Site. The purpose of the studies was to investigate reports that solvents, inks, and methyl ethyl ketone were buried in a ditch on site. The investigations consisted of sampling two sumps on site and installing and sampling four monitoring wells at the north end of the facility. No chemical compounds were detected in the soil, bedrock, or groundwater above MCLs.

In November 1990, Burns & McDonnell completed a Groundwater and Wastewater Assessment which identified and characterized waste water streams and ground water concerns. The report indicated that additional monitoring wells were needed to define the horizontal and vertical extent of ground water contamination and to evaluate potential contaminant source areas.

In March 1991, Burns & McDonnell supervised investigation and remediation activities in the chrome plating area. The production equipment and concrete floor of the plating room were removed and soil samples were taken. Composite soil samples taken after removal activities were completed contained concentrations of total chromium ranging from 426 to 777 mg/kg.

In 1991, OHM Corporation conducted a soil gas survey of the Site in order to determine the best locations for additional wells. Based on this information, six ground water monitoring wells were installed in January, 1992.

In response to allegations of on-site waste disposal activities, OHM conducted a limited scope magnetometer survey and excavated two trenches at the facility in August 1993. This investigation did not reveal any evidence of on-site waste disposal.

In November 1993 and January 1994, OHM Corporation submitted Tank Closure Assessment reports for removal of the solvent, nitrocellulose, and fuel oil underground storage tanks. Contaminated soils were either steam-cleaned on site and replaced in the excavations or removed to a landfill. Ground water samples collected from the tank excavations were found to have numerous compounds including, but not limited to acetone, cis 1,2-dichloroethylene, methyl ethyl ketone, benzene, trichloroethylene, toluene, and tetrachloroethylene in concentrations above MCLs or recommended cleanup levels.

In 1995, Hallmark Cards, Inc. agreed to join the State Deferral Pilot Program. KDHE and the United States Environmental Protection Agency (EPA) Region VII signed a cooperative agreement in October, 1994 to initiate a State Deferral Pilot Program in the State of Kansas. This State Deferral Pilot Program is designed to address potential National Priorities List (NPL) caliber sites which have not yet been placed on the NPL, and certain non-NPL caliber sites in the State of
Kansas. The main objectives of this State Deferral Pilot Program are to: 1) optimize the use of limited state and federal resources; 2) address the NPL and non-NPL candidate sites in a timely manner so as to avoid additional costs to the potentially responsible parties (PRPs) involved; 3) expand the universe of "Superfund Cleanups" to include state-lead action which currently takes place outside of CERCLIS tracking; and 4) foster the development of KDHE expertise on non-time-critical removal actions. The Site is, therefore, CERCLA protective.

3.0 COMPREHENSIVE INVESTIGATION SUMMARY

The purpose of the Comprehensive Investigation was to examine the nature and extent of potentially affected media.

The objectives of the CI were to:

- Determine the extent of environmental contamination;
- Determine the geologic, hydrologic, and other physical characteristics of the Site;
- Identify associated health and environmental risks; and
- Gather sufficient data to identify and support the implementation of an appropriate remedial measure necessary to safeguard human health.

Field activities conducted at the Site provided the following:

- Soil samples were collected from 17 borings with total depths ranging from 6 to 24 feet below ground surface (bgs). At the "volatile organic compounds (VOC) area," eleven VOC constituents were detected in the soil, all below the KDHE Interim Remedial Guidelines (IRG) for Contaminated Soils in residential areas. In the "alleged discharge area," no VOC or metal soil contamination was present above the IRGs for residential areas. Only one soil sample collected in the "chromium plating area" indicated a concentration above the IRG of 120 mg/kg for chromium at two to four feet bgs. The concentrations of chromium in all other samples collected at that location were found to be below the IRG.

- Ground water samples were collected in ten temporary ground water monitoring wells and three permanent ground water monitoring wells installed during the CI. In the "VOC affected area," four VOCs were found at concentrations above MCL or the Kansas Action Level (KAL) for drinking water. These are:

  - benzene up to 22.6 ug/l (MCL = 5 ug/l),
  - methylene chloride up to 251 ug/l (KAL = 50 ug/l),
  - toluene up to 5850 ug/l (MCL = 1,000 ug/l), and
  - vinyl chloride up to 5.11 ug/l (MCL = 2 ug/l).
In the “alleged discharge area” and the “chromium plating area,” no VOCs or metals were detected in ground water above MCLs.

- Surface water, collected from an intermittent stream bisecting the Site and draining towards the south to a tributary of Seven Mile Creek, showed no indication of contamination. The sample location was down stream of the “alleged discharge area.”

- Small-scale in-situ aquifer tests (slug tests) were performed at four temporary test wells. The horizontal ground water velocity within the aquifer was found to be approximately 0.6 to 4 feet per year.


4.0 SUMMARY OF SITE RISKS

4.1 Contaminant Characterization

The Comprehensive Investigation identified and characterized a total of five chemicals of concern at the site. Four of the chemicals of concern were detected within ground water and one chemical of concern was detected in shallow soil (approximately four feet bgs). All four chemicals of concern in ground water are classified as volatile organic compounds based upon their natural tendency to transform from a liquid phase to a gaseous phase at ambient room temperature and pressure. The chemical of concern in soil is chromium. All five chemicals of concern were retained and evaluated to determine their potential threat to human health and the environment.

4.2 Exposure Assessment

The exposure assessment describes the potential for adverse human health effects attributable to exposure to chemicals of concern identified at the site. The objectives of the exposure assessment are to: 1) identify complete exposure pathways; 2) identify potentially exposed populations; and 3) measure or estimate the magnitude, duration, and frequency of exposure.

Based upon information and data generated during the Comprehensive Investigation, the following potential exposure pathways were identified:

- ingestion of contaminated ground water and soil;
- inhalation of airborne particulates and volatile organic compounds within ground water; and
- dermal exposure to contaminated ground water and soil.
Regarding the chromium contaminated shallow soil, the primary potential routes of exposure would be via ingestion, dermal contact, and/or inhalation of airborne particulates, including dust. However, the data collected to date show no evidence of significant surface soil contamination. Areas where subsurface soil contamination were identified are presently covered; therefore, the potential pathway for human exposure to contaminated soils has been significantly reduced. Human exposure to chromium contaminated soil is possible during excavation activities in the area of soil contamination. This chromium exposure is considered unlikely; moreover, such an exposure would likely be of short duration.

4.3 Qualitative Risk Characterization

The qualitative risk characterization process evaluates data and information collected during the Comprehensive Investigation to characterize current and potential future human health risks posed by contamination at the site. Human health risk is a consequence of exposure, or potential exposure, to contaminated environmental media. If human exposure to chemicals of concern occurs, the risk or probability of adverse health effects are evaluated by estimating potential exposure intakes and durations.

Although ground water contamination by volatile organic compounds was confirmed during the Comprehensive Investigation, human exposure to contaminated ground water does not currently occur nor is it likely to occur in the future because the aquifer is not capable of providing an adequate (or economical) supply of water.

Chromium contaminated shallow subsurface soils were identified in the chromium plating area. With the exception of one sample, all subsurface soil contaminants detected were present at concentrations below KDHE/Bureau of Environmental Remediation Interim Remedial Guidelines (IRGs) for contaminated soils. Recommended clean-up levels, or IRGs, were developed to be adequately protective of human health for potential exposures in residential and non-residential land settings. A soil sample collected at four feet bgs detected chromium above the IRG of 120 mg/kg for residential land uses. The area where subsurface soil contamination was identified is presently covered with clean topsoil; therefore, the human health risk posed by the contaminated subsurface soils is minimal.

5.0 REMEDIAL ACTION OBJECTIVES

Based upon the findings of the Comprehensive Investigation and qualitative risk assessment, the following remedial action objectives (RAOs) have been established for the Site:

- reduce the potential for human exposure to ground water contaminated within the aquifer; and
- prevent the off site migration of contaminated ground water.
6.0 SUMMARY OF REMEDIAL ALTERNATIVES EVALUATED

Based upon the remedial action objectives established for the Hallmark Site, general response actions were identified to develop categories of technologies capable of satisfying the remedial action objectives. General response actions retained for detailed evaluation include:

- **No Action.** No remedial measures would be taken to address health and environmental concerns identified at the site. This action is included as a baseline against which other corrective action alternatives are compared.

- **Monitoring.** The ground water at the site would be monitored. Several existing ground water monitoring wells plus one additional well would be periodically sampled.

- **Institutional Controls.** The use of ground water would be prohibited unless otherwise approved by KDHE.

- **Natural Attenuation and Biodegradation.** Contaminants present in ground water can naturally degrade over time through several processes, including: acid-base hydrolysis or oxidation-reduction reactions with water, sorption (binding to soil particles), dispersion, dilution from recharge, volatilization, and biological processes.

- **Ground Water Extraction.** A pump-and-treat process would be installed in the areas of contamination above MCLs. This alternative would require two ground water recovery wells. Existing well OW-10 would serve as one recovery well. This well is presently pumping ground water directly into the oil/water separator and has been in operation since 1984. Based on the ground water pump-and-treat flow rate of 0.5 gallons-per-minute, the estimated radius of influence would be 80 feet. This should be sufficient to capture the dissolved VOC plume identified in the Comprehensive Investigation.

In accordance with the KDHE scope of work for performing a Corrective Action Study and the "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (EPA, 1988), three remedial action alternatives were assembled and evaluated in detail. Each remedial alternative was evaluated using the following seven criteria: 1) overall protection of human health; 2) compliance with state and federal guidelines and standards; 3) reduction in toxicity, mobility, or volume of contaminants; 4) long-term effectiveness and permanence; 5) short-term effectiveness; 6) implementability; and 7) cost. The three remedial alternatives studied in detail include:

**Remedial Alternative 1 - No Action.** Remedial Alternative 1 involves no remedial action. No further action, whether institutional or technology based would be taken. The no action alternative fails to meet both of the remedial action objectives (Section 5.0), therefore this alternative is not acceptable.
Remedial Alternative 2 - Natural Attenuation and Biodegradation with Confirmation Monitoring. Remedial Alternative 2 would likely satisfy the remedial action objectives listed in Section 5.0. Contaminant concentrations in ground water would be monitored as the VOCs degrade in the environment through biodegradation and natural attenuation as described in Section 6.0. This alternative includes periodic ground water sampling and analysis of eight wells in the vicinity of the southwest corner of the P & A Building on the Site and five wells near the southeast corner of the same building. All samples would be analyzed for EPA Method 8260. Of the seven wells to the southwest of the building, one would be a newly installed well located cross gradient of that plume. Institutional controls restricting domestic use of ground water at the Site is also included in this alternative. Hallmark will be allowed to 1) cease current pumping operations at Well OW-10 and begin quarterly ground water monitoring, or 2) continue pumping of Well OW-10 and sample ground water semi-annually. In the first instance, should the contaminant plume begin migrating toward the property boundaries, the resumption of pumping at Well OW-10 will be required and, if necessary, other remedial systems explored. A single additional monitoring well can be installed at a cost of $10,000. The estimated annual quarterly ground water sampling and analysis cost is $46,000. The estimated net present value costs for operating Remedial Alternative 2 for three years is $148,000 with quarterly monitoring or $79,000 with semi-annual monitoring.

Remedial Alternative 3 - Containment and Ground Water Extraction Through a Pump-and-Treat Process. Remedial Alternative 3 would likely satisfy all of the remedial action objectives listed in Section 5.0. Protection to human health and the environment would be met using the pump-and-treat method because it would remove the contaminants from the ground water and inhibit migration from the Site. Semi-annual ground water monitoring would still be required, as in Remedial Alternative 2. Capital costs for a single additional recovery well and pump-and-treat equipment installation would be a cost of $44,300. The estimated annual equipment maintenance as well as ground water sampling and analysis costs is $71,000. The estimated net present value costs for operating Remedial Alternative 3 for three years is $257,300.

7.0 SUMMARY OF THE SELECTED REMEDIAL ALTERNATIVE

Based upon the detailed analysis of remedial alternatives identified in Section 6.0, the KDHE selected remedial alternative for addressing soil and ground water, that meets the RAOs defined in Section 5.0, is Remedial Alternative Number 2.

Through Remedial Alternative 2 contaminant concentrations in ground water would be monitored as the VOCs degrade in the environment through biodegradation and natural attenuation as described in Section 6.0. This alternative includes periodic ground water sampling and analysis of eight wells in the vicinity of the southwest corner of the P & A Building on the Site and five wells near the southeast corner of the same building. All samples would be analyzed for EPA Method 8260. Of the seven wells to the southwest of the building, one would be a newly installed well located cross gradient of that plume. Institutional controls restricting domestic use of ground water at the Site is also included in this alternative. Hallmark will be allowed to 1) cease current pumping operations at Well OW-10 and begin quarterly ground water monitoring, or 2) continue pumping
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8.0 COMMUNITY INVOLVEMENT

The Public Information Program Plan lists governmental contacts for the Site. Public input and comment has been encouraged by KDHE throughout the process. KDHE conducted an availability session at the Leavenworth Public Library on June 25, 1997. Public notice of the availability of the administrative record file containing the Consent Order signed by Hallmark Cards, Inc. and KDHE, the final CI/CAS Work Plan, the final CI/CAS Report, and the Draft Corrective Action Decision document was published in the Leavenworth Times newspaper on June 7, 1997.

In an effort to encourage public awareness and public input into the process, an availability session was conducted on June 25, 1997, at 7:00 p.m. at the Leavenworth Public Library at 417 Spruce, Leavenworth, Kansas. The availability session allowed for the informal presentation of the findings of the investigations performed at the site and identified and described the KDHE preferred remedial alternative. The public was given the opportunity to provide comments to the investigations and to the KDHE preferred remedial alternative. The public was also encouraged to submit written comments to KDHE during the 30-day public comment period from June 7, 1997 to July 7, 1997. Comments received by KDHE are addressed in the Response to Comments Summary Section below.

8.1 Response to Comments Summary

KDHE received no comments at the public availability session on June 25, 1997 or throughout the 30-day public comment period from June 7, 1997 to July 7, 1997.