



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101
JAN 24 2011

VIA ELECTRONIC MAIL AND REGULAR U.S. MAIL

Bruce Haley, P.G.
University of Nebraska
Environmental Health and Safety
3630 East Campus Loop
Lincoln, Nebraska 68583-0824

Re: Response to Request for Extension for Submittal of Revised Remedial Investigation/Feasibility Study

**Former Nebraska Ordnance Plant Superfund Site - Operable Unit 5
Administrative Order on Consent for Remedial Investigation/Feasibility Study and Removal Actions, CERCLA Docket No. 07-2005-0053**

Dear Mr. Haley:

The U.S. Environmental Protection Agency (EPA) has received a request from the University of Nebraska (University) contractor (MACTEC) via electronic mail (e-mail). The e-mail was transmitting a letter dated January 13, 2011, from Keirnan Conner to Ken Rapplean requesting an extension for the submittal of the revised Remedial Investigation/Feasibility Study (RI/FS) to March 23, 2011.

In a letter dated October 15, 2010, EPA provided comments on revised submittals of the RI/FS report (August 13, 2010) and the Baseline Human Health Risk Assessment (August 2010), and approved the Draft Screening Level Ecological Risk Assessment (August 2010). That letter included a schedule of compliance dates to submit a Revised Draft Final Baseline Risk Assessment; submit a work plan to investigate and determine the areal and subsurface extent of the 1,4-dioxane in the groundwater at the Load Line 1 area; and to submit a revised draft final RI/FS Report.

On December 9, 2010, Mr. Joel Pedersen, in a letter to Ms. Cecilia Tapia, requested an extension of time to submit the revised RI/FS. This request did not include the length of the extension request or a proposed date of submittal.

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In a letter dated December 14, 2010, EPA approved the request for an extension of time to submit the Revised RI/FS and set a date of February 11, 2011. That letter also approved the Baseline Human Health Risk Assessment for Operable Unit 5 (OU 5) dated October 2010 and recognized that the University had contacted the Corps of Engineers to discuss the remedial option of ex situ treatment at the Advanced Oxidation Process (AOP) Plant.

A letter dated December 16, 2010, to Ms. Cecilia Tapia from Mr. Steven Iverson of the Corps of Engineers (Corps) provided information on issues of concern and that the Corps cannot allow the joint use of the AOP Plant with the University.

We acknowledge that the field work described in the Fourth Supplemental Sampling and Analysis Plan has now been completed and the extent of the 1,4-dioxane plume has been adequately characterized at Load Line 1. According to the letter from MACTEC dated January 13, 2011, the laboratory analytical results will be available by the end of January 2011.

EPA has been consistent in its comments concerning 1,4-dioxane, which include the following:

1. It is a contaminant of concern.
2. It is a listed hazardous waste and thus a hazardous substance and is currently identified as a probable carcinogen.
3. There is no supportable information that 1,4-dioxane will decay or degrade under the conditions which are known to exist in the OU 5 plume.
4. The Preliminary Remediation Goal for 1,4-dioxane is 6.1 parts per billion for groundwater.
5. The remedial alternatives discussed in the FS will need to consider the effect of other contaminants such as trichloroethene on the remedial technologies that are available.

EPA acknowledges that the position the Corps has taken at this time on the use of its AOP Plant has eliminated one of the remedial alternatives for ex situ treatment.

EPA has determined that the information from the analytical results can be included in Revised RI/FS Report in a timely manner and in consideration of the University's request, has extended the due date for submittal of the Revised RI/FS to March 4, 2011.

If you have any questions of a legal nature, please contact Audrey Asher, Office of Regional Counsel, at (913) 551-7255. If there are any questions of a technical nature, please contact me at (913) 551-7769.

Sincerely,



Kenneth Rapplean
Remedial Project Manager
Missouri/Kansas Remedial Branch
Superfund Division

Enclosure: Mr. Conner (MACTEC) to Mr. Rapplean (EPA); Request for extension;
January 13, 2011

cc: Ms. Stacey Stricker, Nebraska Department of Environmental Quality w/enclosure



engineering and constructing a better tomorrow

January 13, 2011

Mr. Ken Rapplean
Nebraska Ordnance Plant Project Manager
Federal Facilities and Special Emphasis Branch
Superfund Division
U.S. Environmental Protection Agency, Region VII
901 North Fifth Street
Kansas City, KS 66101

Subject: Request for Extension for Submittal of Revised Remedial Investigation and Feasibility Study (RI/FS) Report under Administrative Order on Consent University of Nebraska Agricultural Research and Development Center (ARDC) Mead, Nebraska

Dear Mr. Rapplean:

The purpose of this letter is to request an extension to the submittal deadline for the Proposed Final RI/FS Report for the University of Nebraska ARDC. The proposed submittal date is March 23, 2011. The rationale for this request is provided below.

As you are aware, NU and MACTEC have recently completed field activities for the RI at the ARDC, identifying the extent of the 1,4-dioxane plume in groundwater south of the removed Load Line 1 Disposal Trenches. The second, third, and fourth supplemental site characterization sampling events were conducted in response to a letter from EPA that was dated October 15, 2010 and received by the University on October 18, 2010. One of the requirements stated in the October letter was that the University must better assess the extent of the 1,4-dioxane plume south of the removed Load Line 1 Disposal Trenches.

Sampling and Analysis Events Completed

The following presents a chronology of sampling and analysis events that have occurred since the receipt of the October letter:

- The Second Supplemental Sampling and Analysis Plan was submitted to EPA via e-mail on October 26, 2010, and it was approved by EPA on October 27, 2010. The sampling was performed on November 3 and 4, 2010. Preliminary analytical results from direct push samples and existing monitoring well samples were received from the laboratory on November 22. The results indicated that the plume turned southeastward and the data were not sufficient to identify the plume extent. A conference call between EPA, University, and MACTEC personnel was held on November 30, 2010, to discuss further characterization that was necessary.
- The Third Supplemental Sampling and Analysis Plan was submitted to EPA via e-mail on December 2, 2010, and it was approved by EPA on December 3, 2010. The sampling of existing monitoring wells and an extraction well was performed on December 7 and 8, 2010. Analytical results for 1,4-dioxane, which had been analyzed by a mobile laboratory, were received December 10, 2010. A possible low-level 1,4-dioxane detection downgradient at Well MW-24A led to further sampling.

January 13, 2011
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Mr. Ken Rapplean
U.S Environmental Protection Agency, Region VII
Page 2

- The Fourth Supplemental Sampling and Analysis Plan was submitted to EPA via e-mail on December 17, 2010, and it was approved by EPA on December 22, 2010. The proposed additional direct push sampling was performed on January 4, 5, and 6, 2011. Analytical results for 1,4-dioxane, which were analyzed by a mobile laboratory, for direct push samples and wells MW-24A and 24B, indicated that the 1,4-dioxane plume ends approximately 3600 feet downgradient of the former Load Line 1 Disposal Trenches and does not extend out of Section 23. Sample fractions for RDX explosives analysis and volatile organics analysis were also submitted to the fixed laboratory, TestAmerica in Arvada, Colorado.

Tasks to be Completed

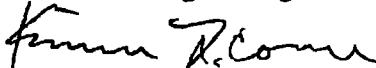
The tasks to be completed before the RI/FS Report can be resubmitted include the following:

- Final results from the fixed laboratory for the January 2011 sampling event will not be received until the end of January 2011. Once the fixed laboratory analytical results are received, they must be loaded into the project database, validated, and qualified.
- The RI/FS Report text, tables, and figures must be updated to include the results of the three groundwater sampling and analysis events.
- The 1,4-dioxane characterization results will be used to update the groundwater remedial alternatives being considered in the FS.
- The groundwater remedial alternatives and their associated cost estimates must be revised and presented in the FS.

The current submittal deadline for the revised RI/FS Report is February 11, 2011, as stated by EPA in an e-mail dated December 22, 2010. Considering the tasks that need to be completed before resubmittal of the report, the February 11 submittal date cannot be achieved. To complete these tasks, more than a month must be added to the submittal date. Therefore, a submittal date extension to March 23, 2011 is being requested. Please send your response to this extension request as soon as practicable.

Sincerely,

MACTEC Engineering and Consulting, Inc.



Keirman L. Conner, PG
Project Manager



Kevin E. Garrett, PhD
Project Principal

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Cc: Bruce Haley, PG – University of Nebraska