

# NPL Partial Site Deletion Narrative

## Rocky Mountain Arsenal (USARMY) Adams County, Colorado

On January 15, 2004, EPA deleted the Surface Deletion Area (SDA) of the Rocky Mountain Arsenal (RMA) site On-Post Operable Unit (OU) from the National Priorities List (NPL). The On-Post OU of the RMA site encompasses 25.5 square miles in southern Adams County, Colorado, approximately eight miles northeast of downtown Denver. The SDA of the On-Post OU comprises approximately 123 acres (0.2 square miles) of the northern and southern perimeter of RMA. This partial deletion pertains to the surface (soil, surface water, sediment) and structures media only and excludes the groundwater media of the SDA.

The RMA was established in 1942 by the U.S. Army and was used to manufacture chemical warfare agents and incendiary munitions for use in World War II. Following the war and through the early 1980s, the facilities continued to be used by the Army. Beginning in 1946, some facilities were leased to private companies to manufacture industrial and agricultural chemicals. Shell Oil Company, the principal lessee, primarily manufactured pesticides from 1952 to 1982. After 1982, the only activities at RMA involved remediation.

Complaints about groundwater pollution north of the RMA site began in 1954. Common industrial and waste disposal practices resulted in contamination of structures, soil, surface water, and groundwater. As a result of this contamination, RMA was proposed for inclusion on the NPL on October 15, 1984.

A remedial investigation (RI) for the On-Post OU was completed in January 1992. Based on evidence gathered during the RI, one soil project was identified within the SDA. The Miscellaneous Southern Tier Soil project included eight contaminated areas; one located partially within the SDA, contaminated with pesticides (aldrin and dieldrin) which presented a risk to human health and biota. A structures survey identified three structures within the SDA. Two of the structures contain contaminants including asbestos, polychlorinated biphenyls, pesticides, herbicides, and heavy metals.

On June 11, 1996, the Army, EPA, and the State of Colorado signed the Record of Decision (ROD) for the On-Post Operable Unit. The ROD required excavation and consolidation of soil presenting risk to human health, as well as munition debris, in a state-of-the-art hazardous waste landfill to be built within the On-Post OU; and excavation of debris and soil presenting a risk to biota and placement of those soils within the Basin A consolidation area. The remedy for structures included the demolition of the two contaminated structures in the SDA. The selected groundwater remedy consisted of continued operation of the groundwater treatment systems, as well as the closing of any wells which had the potential to provide a cross-contamination pathway from the contaminated, upper groundwater aquifer to the deeper, confined aquifer. The ROD also required continued use restrictions for the property.

The Miscellaneous Southern Tier Soil project was completed in 2000. A total of 1,054 bank cubic yards (bcy) of soil presenting a risk to human health was disposed in the hazardous waste landfill. Another 134 bcy of soil presenting a risk to biota was disposed in the Basin A consolidation area. During the design process, it was determined that the two structures in the SDA slated for demolition had been previously demolished. The groundwater below the SDA continues to have contaminants above regulatory standards; the groundwater media is excluded from this partial deletion.

Based on extensive investigations and a risk assessment performed for the SDA of the RMA site, it has been determined that all appropriate CERCLA responses have been completed to protect public health and the environment and that no further response action by responsible parties is required. Therefore EPA, with concurrence from the State of Colorado, proposes to delete the SDA of the On-Post OU of the RMA site from the NPL.