



U.S. ARMY

## ENVIRONMENTAL RESTORATION PROGRAM UPDATE

### CONTACT

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Sunflower Army Ammunition Plant (AAP) is a 9,065-acre excess property, transferred to Sunflower Redevelopment, LLC (SRL) in 2005 under a finding of suitability for early transfer (FOSET). The Army awarded a \$109 million sole-source contract to SRL for explosive decontamination and environmental remediation that also required SRL fund an additional \$32 million in cleanup costs as an “in-kind” consideration for payment for the property secured by a mortgage. In 2010, the cleanup funds were exhausted but approximately 75% of the environmental remediation and 50% of the explosive hazard remediation work remained. In 2015, the Army decided to self-manage the remaining remediation work and this effort at Sunflower AAP is well underway.



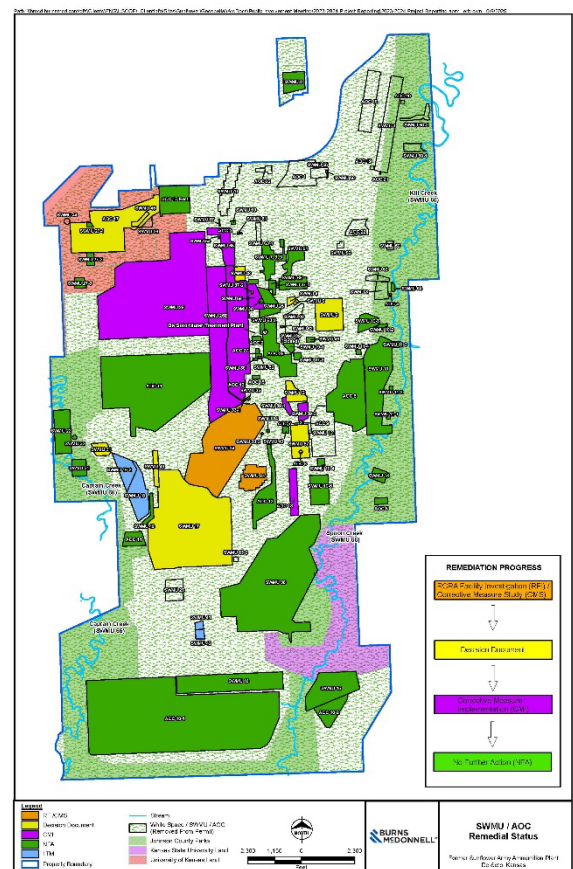
### Overview

- The Army has a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 120(h) obligation at Sunflower AAP and intends to fulfill the requirements to remediate 5,314 acres of contaminated property identified in the conveyance agreement and the FOSET. The Army transferred the remaining 3,751 acres to SRL, in two different transactions, as either clean or remediation complete.
- Both the explosives residue remediation and environmental cleanup response are being conducted in accordance with the Resources Conservation and Recovery Act Permit, issued in 2005.
- The Army performs cleanup using a competitively sourced contracting process. In 2015, the Army assumed management of cleanup responsibilities at Sunflower AAP to best address Army obligations. Since then, the Army has awarded 14 contracts valued at over \$200 million to remediate Sunflower AAP.
- **Current Status.** Of the 97 sites that required RCRA corrective action, 24 have been removed from the RCRA permit. 17 sites received confirmation from the Kansas Department of Health and the Environment (KDHE) that No Further Army Corrective Action is required (soils). 10 sites have an approved No Further Corrective Action Planned (NFCAP) letter from KDHE, 20 additional sites are awaiting KDHE approval for completion. Four sites (landfills) will be closed under Solid Waste Permit #340. Two sites that were related to the explosive cleanup work will be closed as this work is complete. The 20 remaining sites consist of eight in the cleanup phase, six awaiting funding to begin the cleanup phase, five awaiting preparation of an NFCAP request, and one which can't receive NFCAP until all upgradient sites are complete.
- The Army regularly reviews the order of the sites to be cleaned up in conjunction with feedback from the landowner (SRL) to facilitate redevelopment opportunities.
- **Risk Assessments.** At every site requiring an environmental or explosive hazard response, the Army conducts streamlined risk assessments to evaluate which remedy is the safest to implement and is appropriately protective of human health and the environment. Prior to execution, KDHE reviews and approves each work plan at each site, as part of their administrative authority under the RCRA Permit.
- **Documentation of previous work.** The Army has completed documenting prior investigations and corrective measures conducted during the SRL-managed period, from 2005 to 2012.
- **Sampling and data reports.** In 2015, the Army began sampling to estimate the volume of contaminated soils requiring removal at 15 sites. This work is complete.
- **Explosives Decontamination.** In 2015, the Army awarded the first contract to investigate and cleanup environmental contamination beneath explosively contaminated foundations and underneath explosively contaminated sewers inside the foundations. The strategy was to sequence work at each area using KDHE-reviewed standardized work authorization documents. This contract is complete.
- In 2016 the Army awarded a contract to remove and decontaminate bulk or residual explosives from industrial sewers, foundation slabs and foundation footing walls. This included excavation, removal, explosive decontamination, and environmental remediation work underneath the sewers after the explosive hazards have been removed. This contract is complete.
- In 2019 the Army awarded a third contract to finish the

removal, investigation, and decontamination of explosively contaminated foundations, inside sewers and industrial sewers. This work is complete.

- **RCRA Facility Investigations (RFI) and Corrective Measures Study (CMS).** The Army awarded a contract in 2017 to complete RCRA Field Investigations and develop subsequent reports, alternatives, and Army Decision Documents for five sites. This work is complete.
- In 2018 the Army awarded a task order to develop work plans, conduct field investigation and develop subsequent reports, alternatives, and Army Decision Documents for 13 sites. This work is complete.
- In 2019 the Army awarded a task order to complete RFIs, CMS's and Army Decision Documents for 29 sites. This work is complete.
- In 2020 the Army awarded a task order to complete RFIs, CMSs, and Army Decision Documents at 27 sites and investigation of three groundwater operable units. This work is complete.
- In 2021 the Army awarded a task order covering 48 sites requiring at a minimum one phase of the environmental work and includes continued investigation of groundwater sitewide. This contract also prepared the application for the new RCRA Corrective Action permit. This permit will be granted and administered by KDHE. This work is 90% complete.
- **RCRA Corrective Measures.** A 2018/2020 contract provided for removal of environmentally impacted soils and development of Corrective Measures Completion Reports at 21 sites. This work is complete.
- In 2021, the Army awarded a task order to perform RCRA Corrective Measures Implementation (CMI) at 10 sites, including removal of environmentally impacted soils, installation of landfill covers on two of the sites and development of CMI Completion Reports. This work is complete.

- In 2022, the Army awarded a contract with the capacity to complete all remaining RCRA Corrective Measures Implementation (CMI). Three sites have been completed so far and additional sites will be added as funding becomes available.
- **Community Involvement.** A Restoration Advisory Board (RAB) was established in 2024. Since then, quarterly RAB meetings have been held to update the public on the status of the environmental cleanup.
- **Current focus.** The Army will finish the reporting requirements for completed environmental restoration work and prepare to put the remaining six sites on contract to be cleaned up as soon as funding becomes available. The Army will continue to characterize and delineate groundwater.
- **Future focus.** Now that all RCRA sites have completed the soils investigation, the Army plans to finish the cleanup of environmentally contaminated soils and continue to characterize groundwater. The Army will then coordinate with KDHE and develop a long-term groundwater management plan.



## WHERE TO FIND ADDITIONAL INFORMATION:

Army Environmental Command  
website:  
<https://aec.army.mil/sfaap>

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Full Administrative Record