

Former Sunflower Army Ammunition Plant Restoration Advisory Board Meeting

Minutes of the Board Meeting

February 2025

The first meeting in 2025 of the Restoration Advisory Board (RAB) of the Former Sunflower Army Ammunition Plant (FSAAP) occurred on 27 February 2025 at 6 p.m. at the Desoto City Hall Senior Center in Desoto, Kansas.

Army Co-Chairman Present

Scott Smith (Army BRAC)

RAB Members Present

See the attached RAB Sign-In Sheet

RAB Members Absent

Sergio Valenzuela

Ken Herstowski

Cary Rivard

Public Present

Georgia Sizemore

Matthew Rhoades

Bonnie Neis

Lynne Hermansen

Bryan Ross

Brad Williams

Nancy Moneymaker

Teresa Wilke

Diane Wicklund (Johnson County Representative)

Andy Anderson

Army Present

Kathy Baker (US Army Corps of Engineers)

Ian Thomas (Army -BRAC)

Francis David Hufford (US Army Environmental Command)

Call to Order

Scott Smith (Army Co-Chair and BRAC site manager) called the meeting to order at 6:01 p.m. He then proceeded to Old Business on the meeting agenda and requested the adoption of RAB operating procedures. Vicki Selzer commented on procedure #16. She questioned voting on an issue when a member may have a conflict of interest in the mission of the RAB. Chris Connell said the procedure makes sense the way it is written. He explained that the procedure requires that members make it known if they have a conflict of interest.

Mr. Smith called for a vote on operating procedures as written. He recognized unanimous approval by a show of hands of the operating procedures by the board.

The next item of Old Business was approval of the November 2024 RAB meeting minutes. Mr. Smith called for a vote by asking board members to raise their hands. The board approved the minutes unanimously.

Moving to New Business, Mr. Smith discussed the board's desire to tour the former Sunflower Army Ammunition Plant site as soon as possible. He informed the board that a site tour would be scheduled for the afternoon of the next RAB meeting in May 2025. He explained that RAB meetings are scheduled for the fourth Thursday of the month. He asked the board if a May 22 meeting would create conflicts because of the following Memorial Day holiday weekend. No RAB member objected to May 22. Mr. Smith explained that a tour would take about 90 minutes and suggested that an afternoon start between 1 p.m. and 3 p.m. would allow members to tour the site and then gather again at DeSoto City Hall for the board's 6 p.m. meeting.

Dawn Buehler told Smith that in her notes she believed the board agreed to tour the site on Wednesday (5/21) and then meet as regularly scheduled on Thursday (5/22). Mr. Smith responded by saying that scheduling the tour is open for discussion. After some discussion among the RAB members, they initially determined that 1:30 p.m. (this time was later changed to 3:30) on Thursday, May 22, would be an acceptable time and date for board members. Smith advised board members to meet at Sunflower AAP Building 229. Mr. Smith said he would provide board members with a map because the address had changed. The road is now called Astra Parkway. Mr. Smith then realized that the white building where he wanted members to

meet may not be there in May. Mr. Smith informed board members that he will provide an initial meeting location for the tour.

Before moving to the Environmental Update, Mr. Smith provided the board with a brief history of former RAB activities. During the November meeting, Vicki Selzer had asked if prior RAB meeting minutes were available to give the RAB a starting point. Mr. Smith said he reviewed some meeting minutes from the past and explained that about a quarter of the discussions from 2010-11 focused on the explosive cleanup program, which the Army completed in 2023. He also stated that most of the discussion from this timeframe focused on the environmental cleanup sites. For the last 10 years, the Army has been working through the RCRA process to complete these sites.

Mr. Smith then presented the Environmental Update. The Army resumed management for the cleanup of the site in 2015, working with regulators to continue the cleanup process. Three different Army organizations work together to guide the cleanup. The BRAC office has overall responsibility for the site. The US Army Environmental Command is the billpayer for environmental cleanup. The US Army Corps of Engineers awards and oversees contracts and hires contractors to ensure contract execution.

Mr. Smith discussed some highlights of the past 10 years including explosive hazard cleanup, on which the Army first focused its efforts. Mr. Smith explained that the Army initially focused on the northeast corner of the property because of access to K-10 Highway. This is the area where Panasonic is now building its plant. From there, cleanup has proceeded south and west. Mr. Smith said the Army is remediating as fast as possible based on developer requests and the Army has removed contaminated soil and debris from many areas. An initial groundwater plan also has been developed for the entire installation. Mr. Smith said that as part of the administrative record he can provide board members with documents if anyone has questions about a specific area.

Mr. Smith presented a photographic overview of the work accomplished during the last ten years, which included: environmental soil excavation, foundation slab removal, sump and subsurface foundation removal, explosive decontamination of inside sewer pipe, environmental sampling and analysis, transportation and offsite disposal of contaminated soil, and disassembly and inspection of Account 303.

Mr. Smith told the board that a map on display at the meeting shows where all the different solid waste management units are located. He also advised members to use the acronym list they have been provided to help them understand the map. The acronym list will be updated as meetings progress. The goal is to educate and continue to provide information.

Mr. Smith gave an overview of the cleanup process, showing that the Army follows the Resource Conservation and Recovery Act process. He explained the map on display, which depicts different solid waste management units. Many sites are shown in green, representing the "No further corrective action" phase. KDHE must agree that no further corrective action is needed.

Mr. Smith also provided a summary of activities at 97 response sites. At the investigation stage, the Army writes a work plan and gains KDHE approval. The workplan is executed in the field with data being collected in accordance with the workplan. A report is written documenting the fieldwork, data collected and recommendations for future work or recommending no future work. This report is reviewed and approved by KDHE.

If a corrective measure is recommended the site moves to the corrective measure phase. Most remediation options at SFAAP have involved digging contaminated soil and hauling it offsite. Landfills are treated differently as stipulated in the solid waste permit that regulates them. Once funding is allocated for a corrective measure the work is contracted, a work plan is written and approved by KDHE, the work is implemented, and a completion report is written and approved by KDHE. KDHE has review and approval authority for each stage. Finally, the Army submits a "No Further Corrective Action Planned" request to KDHE. Mr. Smith explained that the process does take time and funding.

Mr. Smith introduced Kathy Baker, USACE Program Manager, to discuss five Ground Water Operable Units (GWOU) requiring action. Ms. Baker explained that the goal is to make sure groundwater is safe. Ms. Baker said some groundwater currently shows no human health risks. Ms. Baker said there are three OUs in the Army's RCRA permit. Dawn Buehler asked for the definition of OU. Ms. Baker said that OU stands for Operable Unit. Ms. Baker said that the Army seeks to delineate areas of contamination and find a clean edge. The Army also tests to determine if the groundwater in the area is potable (or will support a household).

Ms. Baker explained that groundwater contaminants at Sunflower are compared to the residential standard. There are ongoing RCRA investigations. Ms. Baker said there are two Operable Units not in the RCRA permit but will be after a new RCRA permit is written by KDHE.

Ms. Baker discussed a recent groundwater investigation at SWMU 15/16 and AOC 10. The only potential contaminant of concern was pesticides. Pesticides were applied to buildings to keep termites from eating wood. As a result of pesticides applied to the soil around buildings, pesticides leached into the groundwater, and we see pesticide concentrations at SWMU 15/16 and AOC 10.

Ms. Baker said some contaminants found in the groundwater are not abnormal. Mr. Smith said some are naturally occurring.

Ms. Baker showed the board a current Operable Unit groundwater map. Operable Units 4 and 5 are proposed. Orange dots represent wells that have been sampled. Ms. Baker said contaminants detected above the screening criteria have been identified in four locations. Ms. Baker characterized all four as having a slight detection above the standard.

Dawn Buehler requested a map of the groundwater on the site that shows where the water is flowing. Ms. Baker said a hydrology map is available by request to Mr. Smith. Ms. Baker said that groundwater flow at Sunflower is limited. However, a map is available for review.

Ms. Baker said that groundwater underneath landfills will be handled differently. Ms. Baker said groundwater at landfills will have to be monitored for quite some time. Ms. Baker discussed the kinds of contaminants discovered during a recent groundwater investigation at SWMU 18/19 and how many wells were being used for this investigation. Ms. Baker said 12 wells were being sampled at this landfill. Ms. Baker said many wells at Sunflower are dry. Other wells have some contamination. At this landfill, one of the wells has an exceedance of nitrate and one of the wells has an exceedance of manganese. Manganese is naturally occurring. Ms. Baker explained that the monitoring program is conducted in agreement with KDHE.

Chris Connell asked if the monitoring program would continue for years. Ms. Baker responded that 30 years is typical for groundwater monitoring of landfills. However, it's possible monitoring could end earlier.

Question: Are dry wells tested? Ms. Baker said soil was tested when those wells were created. The information from those tests is available in online reports.

Ms. Baker said there are two different water-bearing zones at Sunflower.

- Shallow groundwater in the vadose zone
- Bedrock zone of water.

Ms. Baker discussed SWMU 31, a contaminated waste processor and evaporative lagoon. Mr. Smith said green areas on a map of SWMU 31 represent buildings and storage areas that have been removed. Soil has been sampled around the foundations of buildings.

Ms. Buehler asked: What happened to the lagoon? Mr. Smith said there is no water left in the lagoon. It was located on top of a hill and wasn't receiving much water originally. Previous sampling did not find any contaminants. Mr. Smith said it was pretty much dry.

Question: Was it a lined lagoon? Mr. Smith said it was built in the early 1980s. Mr. Smith said he didn't know if it was lined with anything other than clay.

A fuel oil spill was investigated. The evaporative lagoon was examined. Surface samples, subsurface samples, and groundwater samples were taken. New monitoring wells have been installed. There are no sediment exceedances in the lagoon. A few exceedances have been detected in the groundwater – manganese again.

Additional groundwater delineation was conducted from May to October of 2024. Direct push technology wells were installed followed by permanent wells. Direct push wells produce some turbidity issues so if metal exceedances are detected permanent wells are installed. Permanent wells can be pumped in a manner that reduces turbidity and metal detections generally decrease.

Ms. Baker said "No further corrective action" is recommended for groundwater at SWMU 31.

Audience member Teresa Wilke, of Lawrence, Kan., asked: Will the Army screen for PFAS? (Per- and polyfluoroalkyl substances, also known as so-called “forever chemicals.”) Ms. Baker said, yes, the Army has done some PFAS investigation. Ms. Baker said the Army has completed a preliminary site investigation for PFAS. The Army will continue to do more investigation as it receives funding. Ms. Baker explained that PFAS cleanup is accomplished under a different environmental act. Ms. Baker said an investigation for PFAS has been planned and requested. Ms. Baker disclosed that preliminary examinations found PFAS at one location at Sunflower, a former fire station site. Ms. Baker advised the board that this investigation is in its very early stages.

Ms. Baker reported that SMWU 39 AND 58 are in the Corrective Measures Implementation phase. Both have been funded, and planning is underway. She expects to complete the cleanup at those sites this summer. SMWU 39 is known as the South Acid Area Drainage Ditch. Ms. Baker says the ditch does not support aquatic life. The Army has found some dioxins in one limited area. A contractor has completed a pre-design investigation, involving identifying hot spots and clean spots. Baker referenced a purple box on a presentation map, which she said is part of the drainage ditch.

Dawn Buehler said she’s having difficulty identifying sites on the map. She asked if a landfill was for construction debris or sanitary waste. Mr. Smith reported that the site in question was an ash landfill, specifically a coal ash landfill. Smith said he did not know if it was lined. He said groundwater monitoring must occur there. Mr. Smith said the landfill does have a fairly substantial cap on it.

After the environmental update, Mr. Smith led a discussion to develop the agenda for the next RAB meeting and the RAB tour of the Sunflower site. He reminded the board that they previously agreed to meet at 1:30 p.m. on May 22 for the tour, with the RAB meeting scheduled for 6 p.m. in DeSoto, Kan. Smith asked the board who would be able to attend and identified 12 or 13 individuals who raised their hands.

Audience member Matthew Rhoades asked if the public could attend the tour. Mr. Smith responded that he didn’t have the authority to allow the public on the tour and reminded the audience that RAB members are their representatives. Mr. Smith encouraged audience members to ask questions of RAB members after they toured the site. Smith said a developer must approve who is allowed on site, and only RAB members have received that approval.

Tim Holverson asked if the tour and meeting could be consolidated, eliminating the two-hour break in between. Ian Thomas, BRAC Program Manager, said he could oversee the meeting preparations after RAB members return from the tour. Mr. Smith told the group that the tour would be a drive through the areas where cleanup is happening. RAB members will look at the areas and ask questions. Smith reported that there are not a lot of tremendous features left at Sunflower. Most buildings on the site are long gone. Mr. Smith said lots of trees are growing.

The tour will get the RAB as close as possible to cleanup sites, but Smith advised that the roads are not well maintained.

After more discussion, the RAB agreed to change the meeting time to 3:30 p.m. for the site tour and return for their scheduled meeting at 6 p.m. on Thursday, May 22. Mr. Smith reported that no safety gear would be needed for the tour. The RAB won't be getting out of the tour vehicles.

There was continued discussion about the agenda for the next RAB meeting. Mr. Smith said the next environmental update will discuss specific environmental activities. There are 32 sites where the Army is still actively working.

Dawn Buehler asked if she could learn more about the groundwater. She wants more detail to better understand the lay of the land. Ms. Buehler said it's important to understand where the Army is in the cleanup process. Mr. Smith responded that the groundwater conceptual site model provides the information she seeks. Andrew Peterson, KDHE, reported that an ISL detail page has that information as well. Mr. Smith said that if he receives the web address for that page, he will include it in these meeting minutes. The KDHE website is:

https://keap.kdhe.ks.gov/BER_ISL/GetIdentifiedSiteListing.aspx?ProjectCode=C4-046-00052&SiteName=SUNFLOWER%20AAP%20%28PARENT%20SITE%29

Mr. Smith told the board that he can provide members with anything that is part of the administrative record.

A RAB member asked about a parcel on 95th Street, east of Sunflower Road.

Mr. Smith reported that the parcel is an old river water treatment plant. He said both the land and groundwater inside the SWMU boundary have been tested, the lagoons have been cleaned, and they are closed. Mr. Smith said no further Army action is required. The large building on site belongs to the developer and will have to be remediated. Mr. Smith reported the building contains asbestos, which is outside the Army process.

Paul Oberle asked about identifying the controlling entity for cleanup. He specifically wanted to distinguish between the roles of the U.S. Army Corps of Engineers, KDHE, and the U.S. EPA.

Mr. Smith explained that every remediation action has a work plan. KDHE has oversight of the RCRA permit. Andrew Peterson of KDHE is writing a new RCRA permit. Mr. Smith explained that the current RCRA permit was last modified in 2006. Correction: The last major modification of the RCRA permit was in 2006. It has been modified to remove a few sites in 2022, 2023 and 2024. According to Smith, the EPA holds the RCRA permit, the KDHE manages the RCRA permit, and the U.S. Army Corps of Engineers hires professional environmental engineering companies to perform cleanup. Smith said the Corps has experts to oversee work plans, which are then provided to KDHE. Smith said every phase along the way has before- and after-reports. KDHE must agree to all work plans and completion reports.

Mr. Smith explained the types of documents available to the public, which include the corrective measures implementation reports. The agencies work together closely and interact regularly. Mr. Smith agreed that the EPA delegates management to KDHE, with the Corps of Engineers coordinating cleanup efforts.

Ms. Baker explained the different types of environmental cleanup permits: RCRA and CERCLA. A RCRA permit is for hazardous waste generators or storage sites. Generally, ammunition plants follow RCRA requirements. She explained that remediation is dependent on which program the site is regulated under but both programs mirror each other in remediation phases.

Ms. Baker said PFAS are not regulated under RCRA but by CERCLA. Mr. Smith reported that the Sunflower site is 3 miles wide by 5 miles long.

Chris Connell asked about anticipated changes that may occur because of the new Presidential administration. Mr. Smith said everything is subject to the availability of federal funds. For now, Smith said the cleanup process is continuing when funding is available.

Teresa Wilke asked about the location of the fire station at Sunflower. Mr. Smith said the fire station is located at the south end of AOC 16, SWMU 26, basically in the center of the property.

Question: Will DOGE examine environmental cleanup budgets? Mr. Smith said the Army doesn't control that. Smith added that no open contracts have been canceled.

There were no additional questions.

All RAB members in attendance voted to adjourn the meeting at 7:25 p.m.