



U.S. ARMY

SUNFLOWER ARMY AMMUNITION PLANT

JUNE 2024

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 its three-phased remediation effort at Sunflower AAP is well underway.

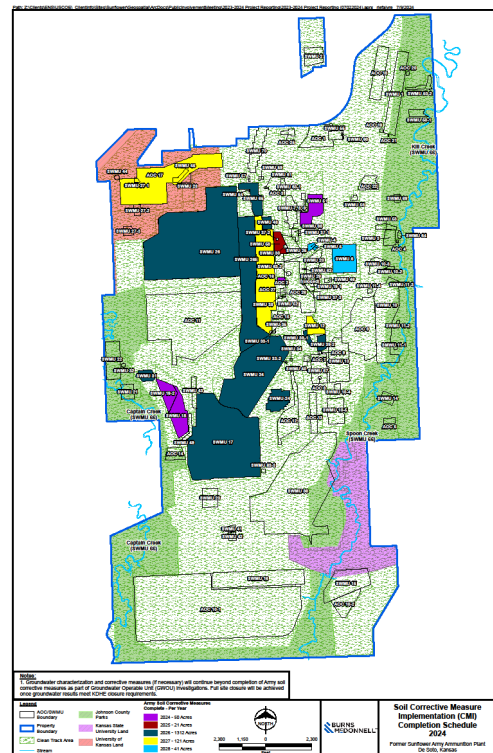


Overview

- 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 original Resources Conservation and Recovery Act Permit, issued to the Army 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). An additional 11 sites are awaiting KDHE approval for completion. Two sites were closed under Solid Waste Permit #340 and two additional sites are in the closure process. All four sites are landfills. The 41 remaining sites consist of 18 in the investigation phase, 17 in the draft no further corrective action planned (NFCAP) phase, three in the cleanup phase and three awaiting a path forward.
- 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.
- **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 includes excavation, removal, explosive decontamination, and environmental remediation work underneath the sewers after the explosive hazards have been removed. This contract is also 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.

- **Sampling and data reports.** Additionally, in 2015, the Army began sampling to estimate the volume of contaminated soils requiring removal at 15 sites. 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 nearing completion.
- 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 85% 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.
- **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 98% complete.

- In 2022, the Army awarded a contract with the capacity to complete all remaining RCRA Corrective Measures Implementation (CMI). One site has been completed so far and as funding is available additional sites will be added.
- **Community Involvement.** The Army solicited interest in forming a Restoration Advisory Board (RAB) in the community in 2024. It was determined that sufficient interest was shown, and formation of a RAB is in progress. The Army also plans to hold a public meeting in July 2024 to update the community.
- **Upcoming Contracts.** In FY 2024/25 the Army is planning to award a task order to address four to five soil corrective measures requirements if funding is available.
- **Current focus.** The Army has completed the explosive hazard decontamination. The Army's strategy was to clean and clear the upgradient areas before addressing downgradient areas. The Army has begun the task to characterize and delineate groundwater.
- **Future focus.** The Army plans to continue the full characterization of all response sites and prioritize environmental cleanup to support stakeholder priorities. The Army will continue to develop the site-wide groundwater remediation plan. The Army expects to complete all soils cleanup by the end of 2028.



WHERE TO FIND THE ADMINISTRATIVE RECORD:

Johnson County Public Library
9875 West 87th Street
Overland Park, KS 66212
(913) 826-4600

Limited Information Repository

Sunflower Army Ammunition Plant
35425 West 103rd Street
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Full Administrative Record