

Declaration

Declaration

Site Name and Location

Rocky Mountain Arsenal
On-Post Operable Unit
Commerce City, Adams County, Colorado

Statement of Basis and Purpose

This Record of Decision (ROD) presents the selected remedial action for the Rocky Mountain Arsenal (RMA) On-Post Operable Unit in southern Adams County (east of Commerce City) Colorado. This remedy was selected based on the administrative record for the On-Post Operable Unit and chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

U.S. Army (Army) regulations allow for the integration of the requirements of both the National Environmental Policy Act (NEPA) and CERCLA into one document. This ROD is intended to comply with NEPA, except as related to the acquisition of permanent replacement water supplies, and as related to connecting residences in the Henderson, Colorado area to an existing domestic water system.

In accordance with federal law, the federal funding of the Army for implementation of the ROD is subject to appropriations from Congress and other requirements of the Anti-Deficiency Act, 30 USC 1341, *et seq.* The Army shall request, through the normal Army and U.S. Department of Defense budgetary processes, all funds and authorizations necessary to meet the conditions of, and to implement, the final remedy.

The U.S. Environmental Protection Agency (EPA) and the state of Colorado concur on the selected remedy.

Assessment of the Site

RMA was established in 1942 by the Army 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 (Shell), the principal lessee, primarily manufactured pesticides from 1952 to 1982. Common industrial and waste disposal practices used during these years resulted in contamination of structures, soil, surface water, sediment, and groundwater.

One hundred eighty-one sites with varying degrees of contamination, ranging from areas of several hundred acres with multiple contaminant detections at concentrations up to a few parts per hundred to isolated detections of single analytes at a few parts per billion, were delineated during the Remedial Investigation (RI) Program at RMA. Contamination was detected in soil, ditches, stream and lakebed sediments, sewers, groundwater, surface water, biota, structures, and, to a much lesser extent, air. Less extensive or less concentrated sources occur only sporadically within the relatively uncontaminated buffer zone along the boundaries of the site. The most highly contaminated sites (those showing the highest concentrations and/or the greatest variety of contaminants) are concentrated in the central manufacturing, transport, and waste disposal areas. The highest contaminant concentrations tend to occur in soil within 5 ft of the ground surface, although exceptions are noted, particularly at sites where burial trenches, disposal basins, or manufacturing complexes are located. In general, contaminant distribution is significantly influenced by the physical and chemical properties of the contaminants, the environmental media through which they are transported, and the characteristics of the sources, i.e., former manufacturing and disposal practices.

Groundwater contaminant plumes predominantly consist of organic compounds and arsenic, fluoride, and chloride. The organic compounds consist primarily of benzene, dibromochloropropane (DBCP), diisopropylmethyl phosphonate (DIMP), n-nitrosodimethylamine (NDMA), organochlorine pesticides (OCPs), and chlorinated solvents. In addition, elevated concentrations of sulfate are present at RMA's north boundary, chiefly due to natural sources. The unconfined flow system is the principal migration route for groundwater contaminants. The overall concentrations and configurations of the plumes suggest that the greatest contaminant releases to the unconfined flow system have occurred from Basin A and the Lime Settling Basins, the South Plants chemical sewer, South Plants tank farm and production area, the Army and Shell trenches in Section 36, and the Former Basin F. Plumes emanating from the Motor Pool/Rail Yard and North Plants areas are other sources of contaminant releases to the unconfined flow system.

Contaminant sources and pathways were identified to allow a quantitative assessment of the potential for exposure to human and ecological receptors. Twenty-seven contaminants of concern (COCs) were identified for evaluation in the human health risk characterization and 14 COCs were identified for the ecological risk characterization. Most of the potential carcinogenic health risks for human receptors are caused by four chemicals: aldrin, dieldrin, DBCP, and arsenic. Potential excess cancer risks for these chemicals exceed 1 in 10,000 (1×10^{-4}) at some sites. Three chemicals, DBCP, aldrin, and arsenic, account for the majority of noncarcinogenic human health risks (hazard indices exceeding 1.0). The highest estimated risks occur in the central portions of RMA, coinciding with the former location of chemical processing and disposal areas (e.g., the South Plants manufacturing area, the disposal trenches and basins). The primary routes for exposure are consumption, dermal contact, and inhalation. Land-use restrictions and health and safety requirements for site workers and visitors, however, have minimized the potential for human exposure to contaminants on post.

Although it is believed that these COCs are inclusive of the contaminants representing the greatest potential for risk, there are other contaminants that exist that may in the future become a concern (e.g., dioxin). In such an instance, an evaluation of the contaminant with respect to the remedy selected, designed, or implemented will be performed to ensure that the remedy remains protective of human health and the environment.

Under current conditions, biota are the primary receptors of RMA contamination in surficial soil, lakebed sediments, and surface water. Potential risk varies depending on the biomagnification factor (the ratio between the concentration of a chemical in biota tissue to that in soil) used to calculate risk, the chemical or chemical group being considered, and the receptor (trophic box) being considered. Differences among receptors for a given chemical are partly due to differences in the toxicity threshold values that were used to calculate risk, and especially due to differences in the exposure range size. Terrestrial areas where all trophic boxes are expected to be at potential risk (based on cumulative risk from all of the biota COCs combined) are most of the central sections of RMA, even though the specific receptors evidencing risk in one area may be different from those evidencing risk elsewhere. Pesticides (especially aldrin and dieldrin) and metals (especially mercury, which had been conservatively assumed to be present in its most toxic organic form, methyl mercury, but which was later determined to be present primarily as inorganic mercury) are the primary biota COCs. The primary route for biota exposure is ingestion. Consumption of contaminated prey is a concern at higher trophic levels due to contaminants such as OCPs, which are known to bioaccumulate and biomagnify in the food chain.

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this ROD, may present an imminent and substantial endangerment to public health, welfare, or the environment.

Scope and Role of the On-Post Operable Unit

The On-Post Operable Unit is one of two operable units at RMA (Figure D-1). The On-Post Operable Unit addresses contamination within the fenced 27 square miles of RMA proper. The Off-Post Operable Unit addresses contamination north and northwest of RMA.

The contaminated areas within the On-Post Operable Unit include approximately 3,000 acres of soil, 15 groundwater plumes, and 798 remaining structures. The most highly contaminated sites are located at South Plants (i.e., Central Processing Area, Hex Pit, Buried M-1 Pits, Chemical Sewers), Basins A and F, Lime Basins, and the Army and Shell trenches. The primary contaminants found in soil and/or groundwater at these sites are pesticides, solvents, heavy metals, and agent byproducts.

The purpose of the on-post remedial action is to implement remedies that eliminate, reduce, or control current or future exposure to contaminated soil or structures; to reduce contaminant migration into the groundwater;

Record of Decision for the On-Post Operable Unit

and to prevent contaminated groundwater from migrating off post. In addition, it addresses the arrangement for provision of potable water to community residents through the South Adams County Water and Sanitation District (SACWSD). The selected remedy described in this ROD will permanently address the threats to human health and the environment using a combination of containment (as a principal element) and treatment technologies to reduce the toxicity, mobility, or volume of contaminants in groundwater, structures, or soil; comply with applicable or relevant and appropriate requirements (ARARs); and be cost effective.

Since 1975, the Army and Shell have undertaken 14 Interim Response Actions (IRAs) at RMA. Of these, eight IRAs will be continued through incorporation with the selected on-post remedy. Continuing IRAs include groundwater intercept and treatment north of RMA, groundwater intercept and treatment north of Basin F, groundwater intercept and treatment in the Basin A Neck area, boundary systems operation, remediation of other contamination sources (Motor Pool and Rail Yard groundwater treatment), asbestos removal, CERCLA hazardous wastes, and chemical process-related activities. The IRAs were implemented in accordance with Section XXII of the Federal Facility Agreement (FFA) to expedite the mitigation of contamination prior to the selection of final remedial action. The FFA, which formalizes the framework for remediating RMA, was signed by the Army, Shell, EPA, U.S. Fish and Wildlife Service (USFWS), U.S. Department of the Interior, U.S. Department of Justice, and the U.S. Agency for Toxic Substances and Disease Registry (ATSDR) on February 17, 1989. Actions requiring removal of material have been carried out in accordance with CERCLA and its regulations and have been consistent with and contribute to the efficient performance of the final response action for the On-Post and Off-Post Operable Units. Examples of early remedial actions include the following:

- Constructing (from 1978 to 1984) and operating three boundary groundwater containment systems and six other systems that currently treat more than 1 billion gallons of groundwater per year (more than 10 billion gallons to date)
- Excavating and storing in an engineered wastepile approximately 600,000 cubic yards of Basin F soil and sludge, covering the remaining area of Basin F, and completing the on-site treatment of more than 11 million gallons of Basin F liquids in a specially designed incinerator
- Dismantling the hydrazine blending and storage facility and removing the debris to an off-post hazardous waste landfill
- Installing a soil cover and slurry wall to reduce movement of contaminants from the Shell Trenches in Section 36

More detailed information on the individual IRAs can be found in Section 2 of this ROD and in IRA-related documentation at the Joint Administrative Record Document Facility.

The selected remedy for the On-Post Operable Unit, integrated with the IRAs and the selected remedy for the Off-Post Operable Unit, will comprehensively address all contamination at RMA. If an IRA will not fully address the threat posed by a release and further response is required, the Army will ensure the IRA will either

be incorporated as part of the final response action or end to avoid duplication between the IRA and final response action. The ROD for the On-Post Operable Unit will be the final response action at RMA.

Description of the Remedy

The selected remedy for the On-Post Operable Unit was developed based on the contaminated media present at the site. The major components of the selected remedy for contaminated water, structures, and soil are described below.

Water

The selected water alternative includes the following elements:

- Continued operation of the three RMA boundary groundwater containment and treatment systems, the North Boundary Containment System (NBCS), the Northwest Boundary Containment System (NWBCS), and Irondale Containment System (ICS), which treat groundwater to attain ARARs and health-based remediation goals. These systems and the on-post groundwater IRA systems (Basin A Neck, North of Basin F, Motor Pool, and Rail Yard) will continue to operate until shut-off criteria specified in Section 9.1 of this ROD are met. ARARs for chloride and sulfate at the NBCS will be achieved through natural attenuation as described in "Development of Chloride and Sulfate Remediation Goals for the North Boundary Containment System at the Rocky Mountain Arsenal" (MK 1996). Assessment of the chloride and sulfate concentrations will occur during the 5-year site reviews.
- Installation of a new extraction system to intercept and contain a contaminated groundwater plume in the northeast corner of Section 36 that will be treated at the Basin A Neck IRA system.
- Water levels in Lake Ladora, Lake Mary, and Lower Derby Lake will be maintained to support aquatic ecosystems. The biological health of the ecosystems will continue to be monitored.

Lake-level maintenance or other means of hydraulic containment or plume control will be used to prevent South Plants plumes from migrating into the lakes at concentrations exceeding Colorado Basic Standards for Groundwater (CBSGs) in groundwater at the point of discharge. Groundwater monitoring will be used to demonstrate compliance.
- Monitoring and assessment of NDMA contamination in support of potential design refinement/design characterization to achieve remediation goals specified for boundary groundwater treatment systems.

Structures

The selected structures alternative includes the following elements:

- Demolition of structures with no planned future use in accordance with a refuge wildlife management plan and salvage of metals where appropriate.
- Disposal of demolition debris from structures with significant contamination in the new on-post hazardous waste landfill.
- Monitoring of all debris from structures associated with Army chemical agent manufacture and treatment by caustic washing for all debris testing positive for the presence of agent followed by disposal in the new on-post hazardous waste landfill.
- Disposal of debris from other structures under the Basin A cover.
- Disposal of process equipment structural debris contaminated with asbestos or polychlorinated biphenyls (PCBs) in the new on-post TSCA-compliant (Toxic Substances Control Act) hazardous waste landfill.

Soil

The selected soil alternative primarily contains soil with principal threat (1×10^{-3} excess cancer risk or hazard index exceeding 1,000) and human health exceedances (1×10^{-4} or hazard index exceeding 1.0) and treats the remaining principal threat soil. The selected soil alternative includes the following elements:

- Treatment of approximately 180,000 bank cubic yards (BCY) of soil at the Former Basin F site by in situ solidification/stabilization.
- Treatment of approximately 1,000 BCY of materials from the Hex Pit by an innovative thermal technology. Disposal of the remaining 2,300 BCY of soil in the on-post hazardous waste landfill. Solidification/stabilization will become the selected remedy if all evaluation criteria for the innovative thermal technology are not met.
- Excavation, solidification/stabilization, and disposal in the on-post hazardous waste landfill of approximately 26,000 BCY of material from the Buried M-1 Pits.
- Monitoring of excavated soil associated with Army chemical agent manufacture and treatment by caustic washing for all excavated soil testing positive for the presence of agent followed by disposal in the on-post hazardous waste landfill.
- Excavation, drying if necessary, and disposal of approximately 600,000 BCY of material from the Basin F Wastepile in dedicated triple-lined cells in the on-post hazardous waste landfill.
- Excavation and disposal of approximately 54,000 BCY of material from the Section 36 Lime Basins in a dedicated triple-lined cell in the on-post hazardous waste landfill.
- Off-post destruction (or on-post detonation if unstable) of any identified unexploded ordnance (UXO) and excavation and disposal of UXO debris and associated soil in the on-post hazardous waste landfill.
- Containment using a soil cover or excavation and disposal of PCB-contaminated soil in the on-post TSCA-compliant hazardous waste landfill
- Excavation and disposal of approximately 1.03 million BCY of contaminated soil exceeding the human health site evaluation criteria (1×10^{-4} excess cancer risk or hazard index exceeding 1.0) and surface soil debris from remaining soil sites in the on-post hazardous waste landfill. These remaining soil sites include the following: North Plants, Toxic Storage Yards, Lake Sediments, Surficial Soil, Secondary Basins, Chemical Sewers, Sanitary Landfills, South Plants Central Processing Area, South Plants Ditches, South Plants Balance of Areas, Buried Sediments, Sand Creek Lateral, Section 36 Balance of Areas, and Burial Trenches.
- Installation of slurry walls and RCRA-equivalent (Resource Conservation and Recovery Act) caps with biota-intrusion barriers for the Army Complex Trenches and Shell Trenches, where contamination will be left in place.
- Construction of a RCRA-equivalent cap over the Former Basin F site and soil covers with biota-intrusion barriers over Basin A and the South Plants Central Processing Area.
- Excavation of 1.5 million BCY of soil posing a potential risk to biota and use as fill under the Basin A and South Plants covers and Basin F cap.
- Construction of variable-thickness soil covers over the Secondary Basins, North Plants, South Plants Balance of Areas, and Section 36 Balance of Areas.

Other

Additional components of the on-post remedy that contribute to protection of human health and the environment are the following:

- Provision of \$48.8 million held in trust to provide for the acquisition and delivery of 4,000 acre-feet of potable water to SACWSD and the extension of water-distribution lines from an appropriate municipal water supply distribution system to all existing well owners within the DIMP plume footprint north of RMA as defined by the detection limit for DIMP of 0.392 parts per billion (ppb). In the future, owners of any additional domestic wells, new or existing, found to have DIMP concentrations of 8 ppb (or other relevant CBSG at the time) or greater will be connected to a water-distribution system or provided a deep well or other permanent solution. The Army and Shell have reached an Agreement in Principle with SACWSD, enclosed as Appendix B of this ROD, regarding this matter.
- National Environmental Policy Act – The Program Manager for Rocky Mountain Arsenal will separately evaluate the potential impacts to the environment of both the acquisition of a replacement water supply for SACWSD and for the extension of water-distribution lines.
- The Army and Shell will fund ATSDR to conduct an RMA Medical Monitoring Program in coordination with the Colorado Department of Public Health and Environment. The primary goals of the Medical Monitoring Program are to monitor any off-post impact on human health due to the remediation and provide mechanisms for evaluation of human health on an individual and community basis until such time as the soil remedy is completed. Elements of the program could include medical monitoring, environmental monitoring, health/community education, or other tools. The program design will be determined through an analysis of community needs, feasibility, and effectiveness.
- Trust Fund – During the formulation and selection of the remedy, members of the public and some local governmental organizations expressed keen interest in the creation of a Trust Fund to help ensure the long-term operation and maintenance of the remedy once the remedial structures and systems have been installed. In response to this interest, the Parties (i.e., the Army, Shell, EPA, USFWS, and the state of Colorado) have committed to good-faith best efforts to establish a Trust Fund for the operation and maintenance of the remedy, including habitat and surficial soil. Such operation and maintenance activities will include those related to the new hazardous waste landfill; the slurry walls, caps, and soil and concrete covers; all existing groundwater pump-and-treat systems; the groundwater pump-and-treat system to intercept the Section 36 Bedrock Ridge Plume; the maintenance of lake levels or other means of hydraulic containment; all monitoring activities required for the remedy; design refinement for areas that may pose a potential risk to biota as described in Section 9.4; and any revegetation and habitat restoration required as a result of remediation.

These activities are estimated to cost approximately \$5 million per year (in 1995 dollars). The principal and interest from the Trust Fund would be used to cover these costs throughout the lifetime of the remedial program.

The Parties recognize that establishment of such a Trust Fund may require special legislation and that there are restrictions on the actions federal agencies can take with respect to proposing legislation and supporting proposed legislation. In addition to the legislative approach, the Parties are also examining possible options that may be adapted from trust funds involving federal funds that exist at other remediation sites. Because of the uncertainty of possible legislative requirements and other options, the precise terms of the Trust Fund cannot now be stated.

A trust fund group will be formed to develop a strategy to establish the Trust Fund. The strategy group may include representatives of the Parties (subject to restrictions on federal agency participation), local governments, affected communities, and other interested stakeholders, and will be convened within 90 days of the signing of the ROD.

Notwithstanding these uncertainties, it is the intent of the Parties that if the Trust Fund is created it will include the following:

- A clear statement that will contain the reasons for the creation of the Trust Fund and the purposes to be served by it.
- A definite time for establishing and funding the Trust Fund, which the Parties believe could occur as early as 2008, when the remedial structures and systems may have been installed.

An appropriate means for competent and reliable management of the Trust Fund, including appropriate criteria for disbursements from the Trust Fund to ensure that the money will be properly used for the required purposes.

- Restrictions on land use or access are incorporated as part of this ROD. The Rocky Mountain Arsenal National Wildlife Refuge Act of 1992 and the FFA restrict future land use and prohibit certain activities such as agriculture, use of on-post groundwater as a drinking source, and consumption of fish and game taken at RMA. Continued restrictions on land use or access are included as an integral component of all on-post alternatives. Long-term management includes access restrictions to capped and covered areas to ensure integrity of the containment systems.
- Continued operation of the existing CERCLA Wastewater Treatment Plant to support the remediation activities.
- Stored, drummed waste identified in the waste-management element of the CERCLA Hazardous Wastes IRA may be disposed in the on-post hazardous waste landfill in accordance with the Corrective Action Management Unit Designation Document.
- Continued monitoring as part of design refinement for the remediation of surficial soil and lake sediments that may pose a potential risk to wildlife (see Section 6.2.4.3).

Summary of the Off-Post Remedy

The Off-Post Operable Unit addresses groundwater contamination north and northwest of RMA. A ROD for this operable unit was issued on December 19, 1995. The selected remedies for both of the operable units, integrated with the IRAs, will comprehensively address all contamination at RMA. The components of the selected remedy for the Off-Post Operable Unit, presented below for informational purposes, are as follows:

- Continued operation of the Off-Post Groundwater Intercept and Treatment System.
- Natural attenuation of inorganic chloride and sulfate concentrations to meet remediation goals for groundwater in a manner consistent with the on-post remedial action.
- Continued operation of the NWBCS, NBCS, and ICS as specified in Section 7.2 of the ROD for the On-Post Operable Unit.
- Improvements to the NBCS, ICS, NWBCS, and the Off-Post Groundwater Intercept and Treatment System as necessary.
- Long-term groundwater monitoring (including monitoring after groundwater treatment has ceased) to ensure continued compliance with the Containment System Remediation Goals (CSRGs).
- Five-year site reviews.
- Exposure control/provision of alternate water as detailed in the ROD for the Off-Post Operable Unit.
- Institutional controls, including deed restrictions on Shell-owned property, to prevent the use of groundwater exceeding remediation goals.
- Closure of poorly constructed wells within the Off-Post Study Area (see Figure D-1) that could be acting as migration pathways for contaminants found in the Arapahoe aquifer.
- Continuation of monitoring and completion of an assessment by the Army and Shell of the NDMA plume by June 13, 1996 using a 20 parts per trillion (ppt) method detection limit.
- Preparation of a study that supports design refinement for achieving NDMA remediation goals at the RMA boundary. The study will use a 7.0 ppt preliminary remediation goal or a certified analytical detection level readily available at a certified commercial laboratory (currently 33 ppt).

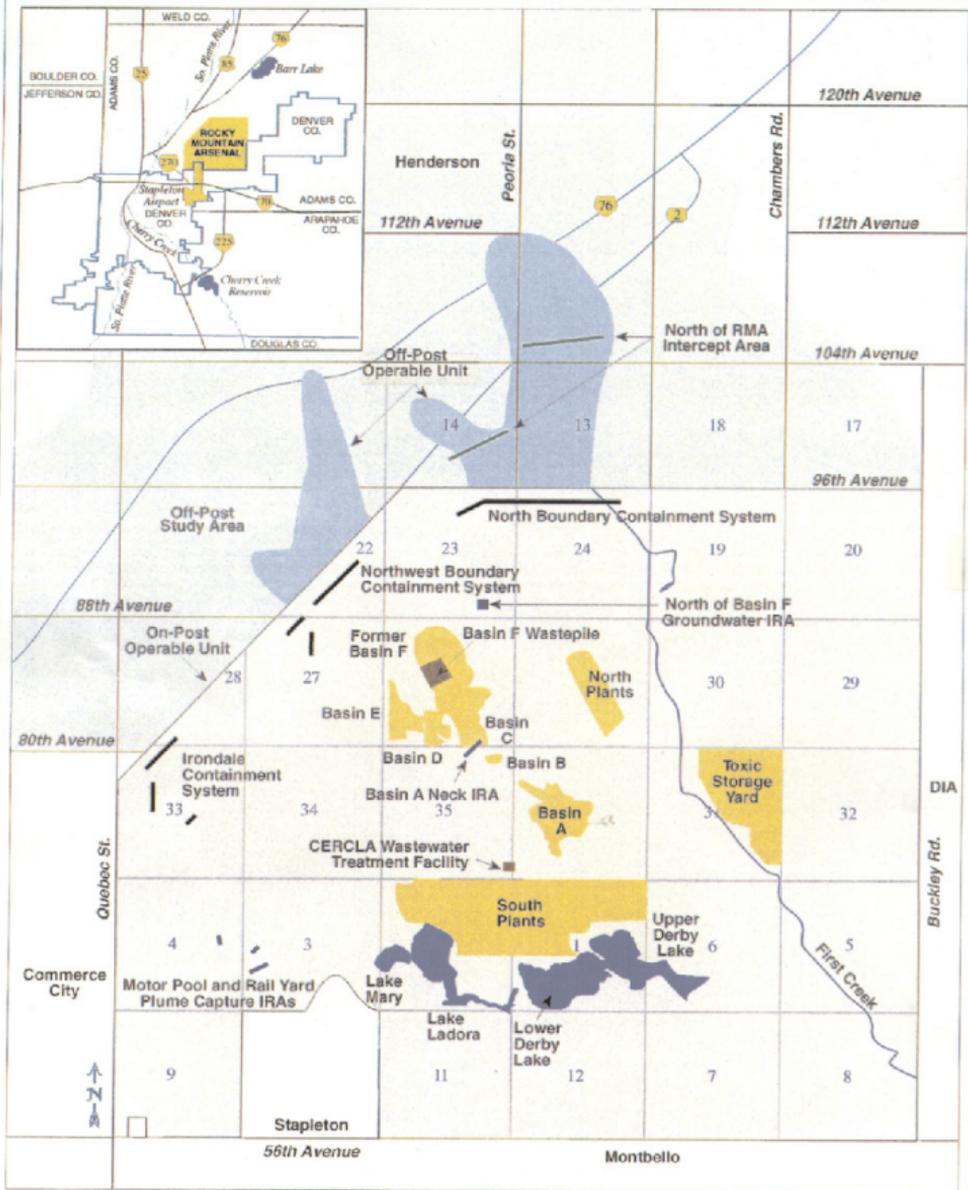
- Tilling and revegetation of approximately 160 acres in the southeast portion of Section 14 and the southwest portion of Section 13 by the Army and Shell.
- Treatment of any contaminated extracted groundwater prior to discharge or reinjection so that it meets CSRGs that meet or exceed the water quality standards established in the CBSGs and the Colorado Basic Standards and Methodologies for Surface Water.

Statutory Determinations

The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective.

The remedy uses permanent solutions and alternative treatment technologies to the maximum extent practicable. Components of the selected remedy satisfy the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element. The large volume of contaminated soil present on the site precludes a remedy in which all contaminants could be excavated and cost effectively treated.

Because this remedy will result in hazardous substances remaining at RMA above health-based levels, a review will be conducted no less than every 5 years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment and complies with applicable regulations.



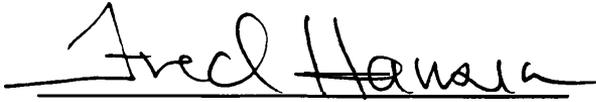
Legend

20	Section (1 section = 640 acres or 1 square mile)
<i>Not to scale</i>	

**Figure 1.0-1
RMA Site Map**

Signature Page

For U.S. Environmental Protection Agency

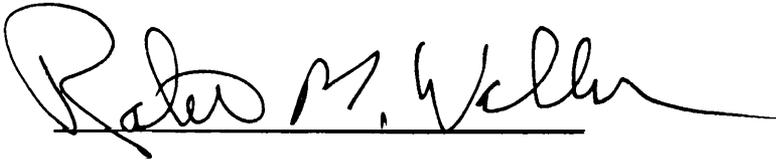


Fred Hansen
Deputy Administrator



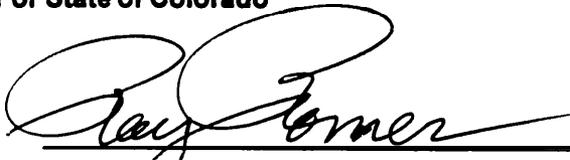
Jack W. McGraw
Acting Regional Administrator, Region VIII

For U.S. Army



Robert M. Walker
Assistant Secretary of the Army
(Installations, Logistics and Environment)

For State of Colorado



Roy R. Romer
Governor



Gail Schoettler
Lieutenant Governor

Shell Oil Company



c/o Holme Roberts & Owen LLC
Suite 4100
1700 Lincoln
Denver, CO 80203

June 11, 1996

Environmental Protection Agency
Region VIII
One Denver Place, 999 18th Street
Denver, Colorado 80202-2413

CERCLA Litigation Unit
Office of the Attorney General
1525 Sherman Street, 5th Floor
Denver, Colorado 80203

Re: Rocky Mountain Arsenal--On-Post ROD

Ladies and Gentlemen:

Shell Oil Company ("Shell") did not invoke dispute resolution on the draft final record of decision for the On-Post Operable Unit of Rocky Mountain Arsenal (the "ROD") under the Federal Facility Agreement dated effective February 17, 1989 (the "FFA"), among the United States Department of the Army, United States Environmental Protection Agency, United States Department of the Interior, Agency for Toxic Substances and Disease Registry, United States Department of Justice, and Shell. Pursuant to paragraph 25.7 of the FFA, Shell is therefore deemed to have concurred in the draft final ROD.

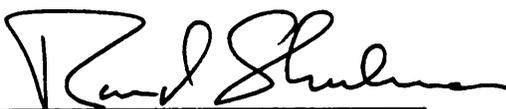
Shell also does not object to the minor changes that have been made since the draft final ROD was issued.

The final ROD is to be signed today. Shell confirms it will not challenge the final ROD under paragraph 25.13 of the FFA.

This letter affirms Shell Oil Company's long standing commitment to a protective and cost-effective remedy for Rocky Mountain Arsenal.

Very truly yours,

SHELL OIL COMPANY

By 

Rand N. Shulman
Authorized Signatory



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Mountain-Prairie Region

IN REPLY REFER TO:

FWS/R6/RMA
Mail Stop 61170

MAILING ADDRESS:

Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:

134 Union Blvd.
Lakewood, Colorado 80228

JUN 11 1996

Raymond J. Fatz, Acting Deputy
Assistant Secretary of the Army
(Environment, Safety and Occupational Health)
OASA (I, L & E)
110 Army Pentagon
Washington, D.C. 20310-0110

Dear Mr. Fatz:

On behalf of the Fish and Wildlife Service I am pleased to endorse and support the signing of this On Post Record of Decision for the remediation of the Rocky Mountain Arsenal. This ROD represents the culmination of years of effort and resolves many years of negotiations between the involved parties. It also represents a major milestone in transitioning the Arsenal to the Refuge as envisioned by Congress in the Rocky Mountain Arsenal National Wildlife Refuge Act of 1992.

There are issues yet to be resolved. The Service remains concerned that the Trust Fund becomes a reality, and it is essential that sufficient water is obtained for maintaining the lakes and revegetating the disturbed areas. It is my hope that the implementation of the ROD results in an expedient and effective remedy to enable the Rocky Mountain Arsenal to become one of the Nation's finest urban national wildlife refuges.

Sincerely,

Regional Director