



TWIN CITIES ARMY AMMUNITION PLANT ROUND LAKE

July 2021

PROPOSED PLAN FACT SHEET

CONTACT:

Dept. of the Army
Remedial Project Manager
Twin Cities AAP

PHONE: (210) 861-4050

CONTACT: Linda Albrecht

EMAIL:

Linda.B.Albrecht.civ@mail.mil

Public Comment Period:

July 9 - August 13, 2021

The U.S. Army invites the public to comment on a Proposed Plan to remediate metals- and polychlorinated biphenyls (PCBs)-contaminated sediments in Round Lake in Arden Hills, MN at the New Brighton/Arden Hills/Twin Cities Army Ammunition Plant (NB/AH/TCAAP) Superfund Site. The NB/AH/TCAAP Superfund Site includes the former Twin Cities Army Ammunition Plant also in Arden Hills, MN. This fact sheet summarizes the Army's cleanup plan and encourages members of the public to provide comments during the 30-day public comment period (**July 9 – August 13, 2021**). The Proposed Plan and associated documents related to Round Lake are available in the Administrative Record and Information Repository at Arden Hills Army Training Site, 4761 Hamline Avenue North, Arden Hills, MN 55112. Please call (651) 282-4420 for an appointment. Electronic copies of the Proposed Plan can be provided by email and are available for download at <https://tcaaprab.org>.



Figure 1. Round Lake Relative Location to TCAAP

Site Background

The NB/AH/TCAAP Superfund Site consists of a 25-square mile area located in Ramsey County, Minnesota. This includes the approximately four-square mile area of the original TCAAP facility and portions of seven nearby communities. TCAAP was constructed in 1941 to produce small-caliber ammunition for the U.S. military. Ammunition production and related activities occurred periodically, commensurate with operations in wars, conflicts, and other national emergencies, and ceased in 2005.

In 1983, the NB/AH/TCAAP Site was put on the National Priorities List after the United States Environmental Protection Agency (USEPA) and Minnesota Pollution Control Agency (MPCA) determined that hazardous substances from TCAAP had been released into the environment. Round Lake is located outside the former TCAAP area as shown in Figure 1 but receives stormwater from a portion of the former installation area.

Round Lake consists of approximately 154 acres of shoreline and lake. Round Lake received industrial processing wastewater, sanitary sewer, and storm sewer discharges from TCAAP. There are three inlets to Round Lake that acted as potential conveyances of water from TCAAP. Ramsey County removed the old TCAAP storm sewer that was the pathway for the historical release of hazardous substances from the former TCAAP area into Round Lake.

Summary of Site Risks

The Human Health Risk Assessment completed for Round Lake concluded no unacceptable risks to potential human receptors. The Supplemental Ecological Risk Assessment found that there was no unacceptable risk to piscivorous species and aquatic animals. However, the Supplemental Ecological Risk Assessment found the metals- and PCBs-contaminated sediments present potentially adverse effects to benthic macro-invertebrates and the waterfowl that ingest them.

Proposed Alternatives

Nine remedial action alternatives were evaluated in the Final Supplemental Remedial Investigation/ Feasibility Study (SRI/FS). A brief description of the remedial alternatives is presented in the following paragraphs. In addition to the descriptions below, most of the alternatives (Alternatives 2, 3, 5, 6, 7, and 8) would include land use controls to prevent disturbance of the sediment such as prohibiting anchoring and installation of infrastructure (e.g., docks) in/on Round Lake.

Alternative 1 – No Action: No remedial measures would be taken to reduce risks to ecological receptors. A No Action alternative is required by the National Oil and Hazardous Substances Pollution Contingency Plan to provide a comparative baseline against which other alternatives may be evaluated.

ROUND LAKE PROPOSED PLAN FACT SHEET

Alternative 2 – Monitored Natural Recovery: Monitored natural recovery uses natural processes to meet the remedial action objective. There would be a stated goal for reduction of the ecological risk to a specified level and within a specified amount of time, with monitoring to track and demonstrate the reduction.

Alternative 3 – Enhanced Monitored Natural Recovery: A thin layer of material (sand) would be placed over sediment to accelerate the natural recovery process.

Alternative 4 – Dredging, Dewatering, and Disposal: Sediment would be dredged, dewatered on land, and disposed of. Dredged sediment would be transported to the TCAAP property, dewatered, and transported to the disposal site. The water produced from dewatering the sediment would be treated and returned to Round Lake or discharged to a sanitary sewer. Disposal Option A (4A) includes offsite disposal at an established landfill. Disposal Option B (4B) includes disposal and management at an impoundment developed on the TCAAP property. The estimated cost for Alternative 4A is \$23.6M and Alternative 4B is \$19.4M.

Alternative 5 – In-Situ Cover: Material (sand) would be placed to serve as a barrier between organisms and the sediment beneath the cover. The estimated cost is \$13.8M.

Alternative 6 - Dredging, Dewatering, and Offsite Disposal of Sediment and In-situ Cover: A combination of technologies will be used including dredging, dewatering, and offsite disposal and in-situ cover. Sediment with higher concentrations of chemicals of concern would be dredged, dewatered, and disposed outside of Round Lake. Remaining sediment with concentrations above acceptable levels would be covered. There are two options for offsite disposal, including an established landfill (6A) and an impoundment constructed on the TCAAP property (6B). The estimated cost for Alternative 6A is \$20.5M and for Alternative 6B is \$19.2M.

Alternative 7 – Near-Shore Confined Aquatic Disposal (CAD) of Sediment within Round Lake: Sediment would be dredged and placed into a near-shore confined aquatic disposal (CAD) facility located in the northwest part of the lake. A CAD is an underwater containment unit designed to isolate contaminated sediment from the environment. The sediment would be covered with material obtained from Round Lake. The estimated cost is \$13.3M.

Alternative 8 – Deep Water CAD within Round Lake: Sediment would be removed and placed into a CAD located in the deepest portion of the lake. The sediment would be covered with material obtained from Round Lake. The estimated cost is \$12.0M.

Alternative 9 – Deep Water CAD within Round Lake and In-situ Cover: A combination of dredging and in-situ cover would be used. Sediment with higher concentrations of chemicals of concern would be removed by dredging and placed into a CAD located in the deepest portion of the lake. Remaining sediment with concentrations above acceptable levels would be covered as described in Alternative 5. The estimated cost is \$11.4M.

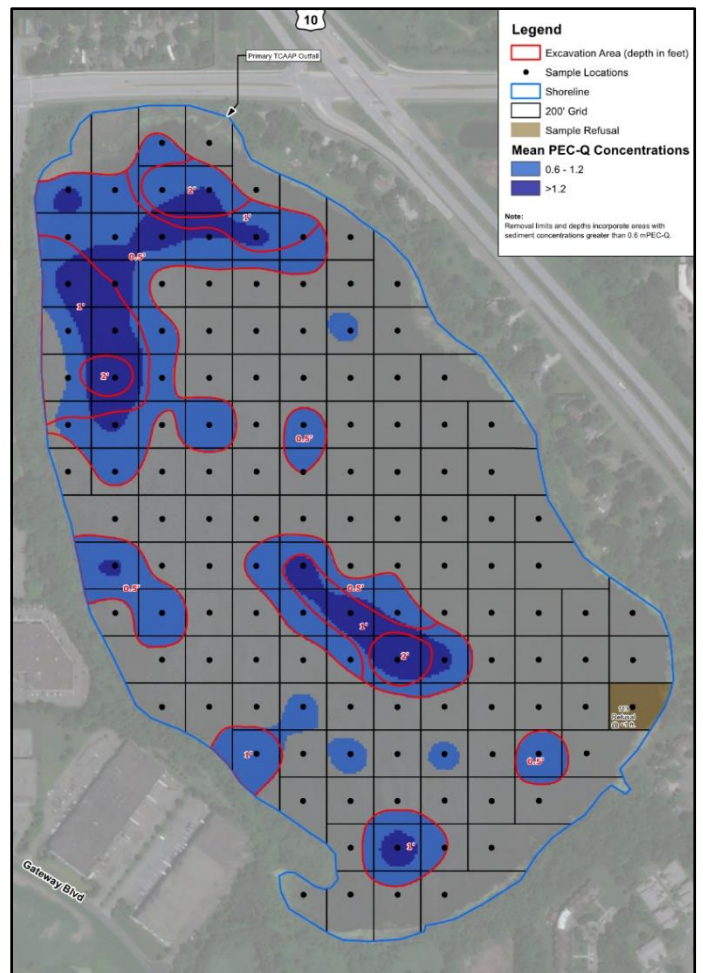


Figure 2. Conceptual Plan for Alternative 4A depicting Round Lake. Areas in light blue and dark blue are targeted for cleanup, as these are areas where contaminant concentrations in sediment exceed cleanup levels.

Preferred Alternative

Alternative 4A is the preferred alternative because it will achieve substantial risk reduction to the benthic community using a proven sediment remediation technology. Alternative 4A ranks among the highest alternatives with significant advantages of long-term effectiveness and protectiveness, and acceptability by the state and landowner.

Community Feedback

After reviewing comments received during the public comment period, the Army and USEPA, in consultation with MPCA, will select a final cleanup plan. The Army and USEPA, in consultation with the MPCA, may modify the proposed cleanup plan or select another option based on new information or public comments received during the public comment period, so your opinion is important. We encourage you to learn more about the Proposed Plan and the site and to make your views and concerns known. The cleanup plan that is finally chosen will be described in a Record of Decision that will include a summary of comments received and how the comments may have influenced the final decision.

How to Submit Comments

The 30-day public comment period is open beginning **July 9, 2021**. Written comments and questions should be submitted no later than **August 13, 2021**, and directed to:

U.S. Army Environmental Command
2455 Reynolds Road, Mailstop 112
ATTN: Linda Albrecht, TCAAP PP
JBSA Fort Sam Houston, TX 78234-7558
Email - Linda.B.Albrecht.civ@mail.mil

Oral comments are accepted after the RAB Virtual Public Meeting.

Open House & Virtual Public Meeting

The Army will host an Open House on **July 20, 2021, from 10:00 a.m. to 3:00 p.m.** at the Arden Hills Army Training site, located at 4761 Hamline Avenue North, Arden Hills, MN 55112. Army personnel will be on hand to respond to questions about the studies related to Round Lake. Attendees will be required to adhere to all National, State, and regional COVID-19 mandates and guidelines in place at the time of the Open House. In addition, the Army will host a virtual Restoration Advisory Board (RAB)/public meeting on **July 20, 2021, at 7:00 p.m.** using Microsoft Teams. Army personnel will present the Proposed Plan and respond to questions. Meeting attendees can submit their comments on the Plan orally at the end of this meeting. Meeting information will be provided to RAB members by email, and interested members of the public should contact Kay Toye by phone at (520) 903-4363 or email at kay.toye@envrg.com to obtain meeting information and register.

Frequently Asked Questions

1. Who prepared the Proposed Plan?

As lead agency, the Army prepared and approved the Proposed Plan. The USEPA and MPCA reviewed and approved the Proposed Plan.

2. What requires the Army to prepare a Proposed Plan?

The National Oil and Hazardous Substances Pollution Contingency Plan, which is the regulations on procedures for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), requires the preparation of a Proposed Plan. USEPA guidance provides content and format recommendations.

3. What kind of installations require a Proposed Plan?

Installations listed on the National Priorities List (NPL), commonly known as Superfund Sites, require a Proposed Plan. Funding for an Army site, like TCAAP, comes from the Army itself. Being listed on the NPL requires the same types of documents be prepared as for other Superfund sites, including the SRI/FS and Proposed Plan.

4. What is contained in a Proposed Plan?

Proposed Plans contain the lead agency's proposed remedial action for a site, which is selected from the alternatives that are compared in the SRI/FS and approved by USEPA and MPCA. Proposed Plans also include a brief description of the site and other alternatives considered.

5. When does a Proposed Plan have to be developed?

Proposed Plans are developed as the SRI/FS is being finalized. The Proposed Plan is finalized before the public comment period.

6. Why does a Proposed Plan have to be developed?

Proposed Plans are created as a single document that clearly states the proposed remedial action at a site so the public can understand and comment on it.

7. How is the public involved with the Proposed Plan?

Proposed Plans are provided at information repositories near the site and online so the public can review and comment on it for a minimum of 30 days. The public is encouraged to comment on this Proposed Plan and attend the public meeting on **July 20, 2021**.

8. What happens after the public comment period ends?

Following the close of the public comment period, the final remedial action selection will be made by the Army and USEPA in consultation with MPCA and issued in a document called the Record of Decision (ROD), after considering public comments. The ROD will contain a Responsiveness Summary addressing public comments.

9. Does the preferred alternative listed in the Proposed Plan necessarily mean that it will be the one chosen?

No. The preferred alternative is proposed based on various criteria, such as protectiveness of human health and the environment, ability to satisfy Federal and State requirements, long- and short-term effectiveness, and cost. Community acceptance is also a required factor that must be considered before selecting the remedial action. Any community concerns raised during the comment period must be considered in conjunction with the other required factors before the remedial alternative is selected.

10. What if the USEPA and MPCA do not agree with the Army's proposed alternative?

Any such disagreements are addressed during the preparation and review of the SRI/FS and the Proposed Plan. The published SRI/FS and Proposed Plan have been approved by the USEPA, MPCA, and the Army.

11. What if the public does not agree with the Proposed Plan?

Comments on the Proposed Plan are accepted at the Virtual Public Meeting on **July 20, 2021**, as well as during the 30-day public comment period beginning **July 9, 2021**. All comments are addressed in writing by the Army in a Responsiveness Summary that is reviewed by the USEPA and MPCA and then published with the ROD. A news release will inform the public that the ROD and Responsiveness Summary are available.

12. How can I submit comments?

Written comments may be sent to the Army's mailing address or email address at the top of this page. Oral comments are accepted during the Virtual Public Meeting.