



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, Washington 98101

July 16, 2003

Reply To  
Attn Of: ECL-112

Commander, Ft. Lewis  
Directorate of Public Works  
ATTN: AFZH-PW MS 17  
(Attn: Col. Richard Conte, Director of Public Works)  
Box 339500  
Ft. Lewis, WA 98433-9500

Subject: EPA Withdrawal from Camp Bonneville Base Closure Team

Dear Col. Conte:

This letter is to notify the United States Army of the Environmental Protection Agency's (EPA's) decision to discontinue involvement with the Base Closure Team (BCT) at the Camp Bonneville Base Realignment and Closure (BRAC) site. This is a decision that EPA has not made lightly. However, given the particular circumstances at Camp Bonneville, EPA has made a management decision to reallocate its limited staff resources to other urgent cleanup needs in Region 10. As Camp Bonneville is among the Department of Defense (DoD) installations included in a Memorandum of Understanding (MOU) between DoD and EPA, we have consulted with our Headquarters Program Office on this matter and they have concurred with our decision.

We made this decision knowing the State of Washington's Department of Ecology (Ecology) has increased its staff for Camp Bonneville. Ecology also has issued an enforcement order for Camp Bonneville. As a result of their increased investment at this site, Ecology requested that EPA not continue in a concurrent oversight role. We have decided to withdraw from the BCT; however, we want to go on record with our ongoing concerns, in the interest of supporting Ecology's, the Army's, and the public's interest in addressing the human health and environmental issues at Camp Bonneville.

After the initial round of base closure legislation, the Department of Defense (DoD) developed guidance which relied on bottom up decision-making by the military service, EPA, the state, and other stakeholders. The BCT was meant to work collaboratively to make cleanup decisions and facilitate reuse of the property. The DoD model and BCTs have been successful in accomplishing those goals at both NPL and non-NPL BRAC sites all over the country including Region 10. In Region 10, the BCT model worked well at Sand Point Naval Station, Seattle, Washington; Fort Greeley, Delta Junction, Alaska; and at Adak Island Naval Air Station, Alaska.

In the case of Camp Bonneville; however, there has not been the level of collaboration that is typical in the BRAC process. Over the past seven years of EPA involvement through the BCT, we have made every effort to assist the Army in characterizing the risks to human health and the

environment at the Camp Bonneville site. EPA has sought to provide information and comments to help improve the site characterization activities relating both to munitions and other contamination. We also provided comments to address what we believe are other significant shortcomings of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) cleanup process that was being implemented. On many issues, the Army has not been responsive to EPA's comments. Enclosure 1 provides examples of significant data gaps and procedural shortfalls at Camp Bonneville which are one result of the lack of cooperation and collaboration in the BCT process.

Even though the Army has completed a number of removal actions, the site lacks the necessary level of site characterization information on which to base long-term remedial decisions. We are also concerned that decisions about property transfer need to be based on better information than is currently available. There is only limited understanding about the nature and extent of contamination primarily from munitions and unexploded ordnance (UXO), but also in limited areas related to chemical releases. We believe that this information could have been developed had the Army incorporated our comments into their characterization workplans and related analyses over the past seven years.

We have made our concerns and comments known to Ecology. We will continue to provide support to Ecology on an "as needed" basis. Please contact me at (206) 553-4181 or at [eaton.thomas@epa.gov](mailto:eaton.thomas@epa.gov) with any questions or concerns.

Sincerely,

/S/

Thomas Eaton, Associate Director  
Office of Environmental Cleanup

Enclosure

cc:	Tim Nord, Ecology	<i>sent via e-mail only</i>
	Barry Rogowski, Ecology	""
	Jim Woolford, EPA	""
	Brian Vincent, Clark County	""
	Karen Kingston, RAB co-chair	""
	Eric Waehling, Army	""
	Nancy Harney, EPA	

Enclosure1:

## **Camp Bonneville Data Gaps**

Significant data gaps at Camp Bonneville BRAC site include:

1. lack of geophysical investigations for the detection of subsurface UXO/munitions in areas of concern such as the proposed Regional Park, the artillery/mortar/rocket Impact Area, and Demolition Area 1 (Approximately 1% of Camp Bonneville has previously been geophysically surveyed for subsurface UXO/munitions, 99% has not been surveyed);
2. lack of Remedial Investigations (RI) on the nature and extent of contamination from UXO/munitions, and soil and groundwater contamination at known disposal areas such as Demolition Areas 1, 2, and 3;
3. lack of an RI to determine the presence/absence of soil and groundwater contamination in the Impact Area due to munitions residues (No soil or groundwater sampling data currently exists for the Impact Area);
4. lack of public review and comment on the proposed response action (EE/CA or Feasibility Study) to take place on Demolition Area 1, including review of the CERCLA standards the Army expects to attain and how these standards were derived;
5. demonstration of attainment of published cleanup standards (ARARs and TBCs) for Demolition Area 1/landfill 4;
6. lack of lead hazard assessment for Camp Killpack where child-occupied facilities are forecasted by the County;
7. improvement of QA/QC procedure for all site sampling including adherence to accepted, published standards (MTCA specified QA/QC is only a starting point);
8. assessment of QA/QC deficiencies from past field efforts to determine if these sampling events should be redone;
9. additional sampling of small caliber firing ranges to account for low sampling density;
10. surface clearance of UXO/munitions the entire Camp including "wildlife" areas which will inevitably be vulnerable to trespass; additionally surface clearance is a required step in conducting subsurface UXO/munitions clearance.
11. location of additional downgradient wells near demolition area 2 that are within 100 feet from Ecology's best estimate of the location of past demolition practices; and
12. lack of an RI/FS for all Camp areas which includes hazardous waste issues, ordnance clearance, and assessment and removal if necessary of ordnance residue.

Examples of CERCLA compliance issues and coordination problems:

1. noncompliance with various parts of CERCLA and the NCP including inappropriate use of time-critical removal authority;
2. refusal to publish in any federal CERCLA Decision Documents clear statements of the applicable requirements for cleanup actions taken, such that regulators and the public may track the Army's compliance; and
3. unilaterally making field changes without consulting regulators, in some cases rendering the field work useless.