

1           A community meeting for the Jefferson Proving Ground  
2 was held at the Madison Jefferson County Public Library, 420  
3 West Main Street, Madison, IN at 7:00 P.M. on March 23,  
4 2004.

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6           **OPENING STATEMENTS BY MR. PAUL CLOUD:**

7           Okay. Good evening. I would like to get  
8 started. This is a community meeting for Jefferson Proving  
9 Ground ah specific to the Proposed Plan and Remedial Action  
10 that is being proposed for some of the soil and groundwater  
11 sites at the Proving Ground. Ah I think most of the people  
12 know me but just in case you don't my name is Paul Cloud. I  
13 am the Army's Environmental Coordinator for the Proving  
14 Ground and it's my job to ah help get the area that the  
15 Proving Ground has identified as environmentally  
16 contaminated cleaned up in those areas south of the firing  
17 line. Tonight ah is an opportunity for the community to  
18 provide input, ah comments to the Proposed Plan. The  
19 Proposed Plan has been on the JPG web site. It's been  
20 mailed out to the RAB members. It's been ah available for  
21 anyone who's been interested. Ah you can give verbal  
22 comments tonight. We have the sign up sheet which I have up

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1 here in front and we will go through that sign up sheet once  
2 we've gone through our brief presentation or you can hand in  
3 ah written comments to the Army and Corps of Engineers  
4 tonight or by the end of the comment period which is the end  
5 of this month, the 31st of March. Without further ado then  
6 I would like to introduce Brooks Evens from the Louisville  
7 District Corps of Engineers. Ah Mr. Evens will go through  
8 the presentation tonight and after that presentation we will  
9 open up the floor first to the registered speakers and then  
10 to any of the other speakers. Kevin?

11

12 **MR. KEVIN HERRON:**

13 One (1) clarification. On the deadline of  
14 the 31st does that mean postmarked by the 31st?

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16 **MR. PAUL CLOUD:**

17 Yeah postmarked is fine. That's fine.

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19 **MR. BROOKS EVENS:**

20 Postmarked by the --

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22 **MR. PAUL CLOUD:**

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By the 31st of March.

**MR. BROOKS EVENS:**

That's okay?

**MR. PAUL CLOUD:**

Yeah. A day or two (2) is not going to make that much difference.

**MS. KAREN MASON-SMITH:**

You do accept E-mails too right?

**MR. PAUL CLOUD:**

We will accept E-mails or faxes, you know anything that's postmarked or dated the 31st of March we will accept. Hopefully there won't be a six (6) month delay in ah snail mail that's marked the 31st and gets to us this December. I don't think that will happen though. We're not the Pentagon.

**MR. BROOKS EVENS:**

I'd like to welcome everyone. I want to recognize a few people that played a key part in our process

1 of going through this process of CERCLA, the RIFS Proposed  
2 Plan and we're now at the public presentation. If Kevin  
3 Herron would raise his hand, he's from IDEM which is Indiana  
4 Department of Environmental Management. He's been the  
5 project manager for IDEM for the last five (5), seven (7)  
6 years? Time has flown through this process. Ah next to  
7 Kevin is Karen Mason-Smith, Region 5 EPA. She's been on the  
8 project probably eleven (11) years, '93 or '94 something  
9 like that. We've got Richard Hill from the RAB. I think  
10 everybody knows him. He's been with the RAB ah --

11

12 **MR. RICHARD HILL:**

13 Since it started.

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15 **MR. BROOKS EVENS:**

16 Since it started right. Ken Knouf who is -  
17 who is the JPG facility manager and all the rest of you are  
18 the public. Ah welcome. We do have the contractors that've  
19 been working on the finalizing the RI, Leo Linnemanstons  
20 and Bruce Iverson with Montgomery Watson and they helped put  
21 the Proposed Plan together and they will help develop the  
22 ROD. Ah we'll go through the introduction, Superfund

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1 Remedial Response Process. The Remediation Sites, those are  
2 the sites that are planned to have Remedial Implementation.  
3 We will do the FS Alternatives Evaluation and then a  
4 summary of each RA site and the preferred remedy that the  
5 Army has ah chosen. Everyone knows that JPG consisted of  
6 fifty-five thousand two hundred sixty-five (55,265) acres.  
7 The RIFS process mainly dealt with the four thousand (4,000)  
8 acres south of the cantonment that's typically known as the  
9 firing line. Ah north of the firing line is going to the  
10 Big Oaks or Tall Oaks?

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12 **MR. PAUL CLOUD:**

13 Big Oaks.

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15 **MR. BROOKS EVENS:**

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Big Oaks National Wildlife Refuge. And the goal of the Army is to transfer this property to have beneficial reuse in accordance with the BRAC policy. Ah for those that aren't familiar ah with the Superfund Remedial Response Process you have ah several processes. We will just start out with the RI processes. There are several processes prior to the ah RI that is - that sets you up for the sites you're going to investigate. You have a site characterate - characterization, baseline Risk Assessment and through that process which JPG took about eight (8) years to get through we have a Phase One (1) which identified areas of Phase Two (2), identified the areas that did not drop out during Phase One (1). After the RI and we get concurrence ah with the regulators we move on to the Feasibility Study. And the process of the Feasibility Study is to develop screening of alternatives. That's where we'll look at all sorts of technologies out there that are available to ah remediate the sites. Ah a lot of the sites at JPG will not require Remedial Action due to the risk. There is no risk for the ah perceived site use. And then you go into what's called a Detail Analysis of the

1 Alternatives where you break down the cost and everything  
2 for all the alternatives. After you've gone through that  
3 you jump into this ah Remedial Selection Process and that's  
4 where we identify the Remedial Actions that we think are  
5 appropriate for JPG given the risks. A lot of risk  
6 management alter - decisions go into this process. And now  
7 we're at the Proposed Plan. The Proposed Plan came out and  
8 it was reviewed by the Army and others - other agencies  
9 within the Army and then after we incorporated those  
10 comments we sent it to the regulators, IDEM, the RAB and the  
11 EPA. And they have provided comments. We've incorporated  
12 those comments and this is where we're at now with the  
13 process, the Proposed Plan, the public comment period. This  
14 is the opportunity of the public to voice their opinion if  
15 they weren't setting on the RAB or if they weren't privy to  
16 everything else that's going on. And as you see the public  
17 comment period ends March 31st, 2004 postmarked and you can  
18 send it by mail. You can hand it to me tonight or E-mail  
19 and all that information is on the JPG web site. After we  
20 go through the process we will accumulate all the comments  
21 from the public at that time and it will get incorporated to  
22 the ah Record of Decision which is the - called the ROD.

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1 And that process will go through the process of review from  
2 the Army, from the regulators and then attorneys will get  
3 involved and then we will have a signing of the ROD which  
4 starts the process of the Remedial Action Alternatives. And  
5 then after we get the ROD signed we go to Remedy  
6 Implementation. We're scheduled to start September 4th of  
7 ah 2004 right after Labor Day. And currently we're in the  
8 Remedial Design phase taking what the Proposed Plan and  
9 Remedial Actions that we're doing, we've already started a  
10 design. And then we will implement the Remedial Action then  
11 we'll have long term remedy and maintenance which is our  
12 groundwater and we will have five (5) year reviews for  
13 those. Originally in the Phase One (1) fifty (50) sites  
14 were identified. After the Phase One (1) investigation  
15 thirty (30) sites remained and were carried forward to the  
16 Phase Two (2) which was to help vertical and horizontal  
17 extent of contamination. Based on the Phase Two (2) RI data  
18 and the Risk Assessment and the Risk Management's Decision,  
19 fifteen (15) sites were carried forward into the FS. Here's  
20 the sites that were carried forward into the FS and some of  
21 these sites have fallen out of the process based on risk  
22 within the ah FS. And here are the sites ah - you can see

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1 all the ones. These are the ones that ah have given us the  
2 most problems and most of these have to do with groundwater  
3 contamination due to solvents disposal. Site one (1)  
4 briefly the ah building 185 incinerator has contaminants of  
5 concern for metal and dioxins. Groundwater there was one.  
6 (1). The proposed intended use for future use is industrial  
7 meaning we'll put Deed Restrictions on that property that ah  
8 the future landowner will not be able to develop that area  
9 for residential use. Ah we went through the Risk Assessment  
10 and you can see that ninety-nine (99) percent of the was the  
11 consumption of beef and milk produced at the site ah but  
12 there are no ecological risks for industrial sites. You  
13 don't take ecological risks into consideration. Ah for this  
14 site the Army proposes to do Deed Restrictions to prevent  
15 residential use and there will be no Remedial Actions  
16 necessary at that site based on the ah Deed Restriction.  
17 Site two (2) and twenty-seven (27) are combined. That's  
18 industrial sewage treatment plants. Again you can see that  
19 the main contaminant was groundwater - ah was metal,  
20 groundwater none. The future land use is intended to be as  
21 is. The sewage treatment plant is currently operating under  
22 an IDEM permit. We had - the main thing was the maximum con

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1 - maximum concentrations of below current Region 9 PRGs but  
2 there was a potential exposure pathway due to dust. There  
3 are again no ecological risks and again the Army proposes to  
4 do Deed Restrictions to prevent the future development of  
5 residential use and again no Remedial Actions will be  
6 necessary. A future landowner won't be able to build  
7 residential use. Site three (3) and four (4) is groundwater  
8 and they were the burning area and the trench area and a new  
9 burn site that was discovered after the Phase Two (2) RI was  
10 completed or nearing completion. We've got metals and VOCs  
11 as a - as a contaminant of concern. Groundwater we had two  
12 (2) Remedial Action Alternatives. We had no action or  
13 institutional controls and monitoring and this assumes  
14 source soil removal which is typically called point source  
15 removal of the contaminants in that trench. And what the  
16 Army is proposing to do is institutional controls and  
17 monitoring. The institutional controls are that we will  
18 monitor the groundwater for a long period of time until we  
19 end up meeting NCLs which are considered PRGs for the  
20 groundwater. And ah that - the actual plan to how we  
21 monitor and what we monitor and the frequency we monitor  
22 will be worked out during Remedial Design with the

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1 regulatory agencies. This site is - is unusual in that we  
2 don't really have any soil. If it was going to be used for  
3 industrial that would need to be removed but six (6) we've  
4 got to remove point source so we can get the groundwater  
5 cleaned up. We are doing a soil removal here so we'll  
6 excavate, we're preferring to do excavate and dispose of the  
7 soil just due to the quantity. Site seven (7) and twenty-  
8 one B (21B) is - is the red lead disposal area and it was  
9 used for loading of inert ordnances. We did a - an Interim  
10 Removal Action to help facilitate property transfers back in  
11 1996. Ah we achieved clean up at that for soils but we had  
12 a groundwater contamination problem that's not related to  
13 the soil disposal at the area. But this future land use is  
14 going to be industrial and the preferred alternative is  
15 going to be institutional controls and monitoring. And what  
16 we will do is monitor the water again to determine if it is  
17 related to background. The arsenic issue ah might be  
18 related to background arsenic due to reduction of ah the  
19 zone. We have a high redux area which could leach out some  
20 of the arsenic out of the soil giving us the higher levels.  
21 Sites nine (9) and ten (10) are north of the land - or  
22 north of the firing line. This site will continue through  
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1 the RI process even though it was north of the firing line.  
2 Ah Gate 19 is a landfill that was closed under ah IDEM  
3 regulations and it's currently undergoing post closure  
4 activities and we have about two (2) more years of that post  
5 closure activities. But there was an area next to it ah  
6 which is Site nine (9), the burning ground. They pulled  
7 that soil up into a landfill but it was an area of concern.  
8 This site conclusion is that this site is not going to be  
9 transferred. It's going to remain in federal hands and no  
10 Remedial Action will be necessary because the access is  
11 restricted. There is basically no risk to the hunter or  
12 trespasser scenario and the only contaminant concern that  
13 possibly has an ecological concern was nadium and it was  
14 found in vanadium. It's similar to background levels of the  
15 streams within the area. Site twelve A (12A), twelve B  
16 (12B) I'll just lump those together are all our solvent  
17 pits. Site twelve A (12A), twelve B (12B) and twelve C  
18 (12C) are solvent pits. We did a soil removal in 2000 to  
19 remove the point source. Ah the future land use is going to  
20 be industrial. The groundwater alternatives are no action,  
21 institutional controls and monitoring, collection and  
22 treatment. The preferred alternative is institutional

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1 controls and monitoring is what the Army's proposing. And  
2 again we'll monitor those sites until they reach NPL or the  
3 PRGs. Same as twelve A (12A). Same as twelve C (12C). The  
4 one (1) thing we have seen after we get the point source we  
5 saw a drop in the pit area with the monitoring wells. We  
6 immediately saw a reduction in contaminant in those wells  
7 that were within the pits so we think that the point source  
8 will help achieve our goals. Site fourteen (14) is yellow  
9 sulfur disposal area. And this site has gone through two  
10 (2) Removal Actions. The initial Removal Action was to  
11 clean up arsenic. We achieved goals arsenic levels PRGs but  
12 we got hit on chrom so we went back and tried to clean it up  
13 and we still did not achieve chrom - chromium levels. We  
14 had UXO concerns with this so what we're proposing here is  
15 to go back and finish up the soil removal that we started  
16 back in 1996 and do it with UXO support of the potential for  
17 UXO in this area. The groundwater fell out of the RI  
18 because all of the levels were below the fifty (50)  
19 milliliters of arsenic but EPA lowered that arsenic level  
20 and this kicked the groundwater back into the process. So  
21 we will monitor the arsenic level here also much like seven  
22 (7) until we come to a reasonable conclusion with the

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1 regulators that this is background level arsenic and is not  
2 related to any sort of contamination. Site twenty-one (21)  
3 and thirty (30) is a temporary storage area. This is where  
4 they use pesticides and store - pesticides and herbicides.  
5 We are going to be cleaning up this because we had a hit for  
6 deldrin - deldrin. And we're going to clean up the  
7 residential use just because the pesticides. Area - the  
8 alternatives were no action, limited action, excavation and  
9 disposal. And given the site, this site is very small, the  
10 Army is just going to excavate and dispose of the material  
11 off site. Now to evaluate all these alternatives you go -  
12 in the FS you go through seven (7) criteria. You go through  
13 nine (9) up here. The modifying criteria comes in during  
14 Proposed Plan and that's why we're here tonight is to get  
15 the State acceptance which is IDEM and the community  
16 acceptance. That's the modifying criteria. If we've got a  
17 lot of public comments saying we don't want that, they want  
18 this, then we take that into consideration and maybe modify  
19 the Army's Proposed Action. Ah but all the areas were  
20 compared to threshold criteria to determine if it was going  
21 to be protected for human health environment and complying  
22 with all the applicable or relevant and appropriate

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1 requirements. They are typically called ARARs and then you  
2 put on this balancing criteria. Cost is the least of the  
3 balancing criteria. Long term effectiveness and permanence,  
4 reduction of toxicity, mobility, volume through treatment,  
5 short term effectiveness, implementability and cost is again  
6 one (1) of the ones that we just really don't put a high  
7 cost to. For Site three (3) and four (4) the groundwater  
8 remedy is going to be institutional controls and monitoring  
9 which we're going to use Deed restrictions. We're going to  
10 restrict the construction of new wells, which will mean that  
11 nobody can go in there and put wells in a three (3)  
12 dimensional zone and draw groundwater. We're going to  
13 perform long term monitoring and this groundwater remedy  
14 assumes soil removal. Then they say the soil remed - soil  
15 remedy and they're going to excavate and dispose of the soil  
16 in the trench which is the source of the VOCs. We're also  
17 going to excavate soils at the new burn sites to remove  
18 zinc, PAH and dioxins. We'll have to characterize the soils  
19 for disposal. If it comes back hazardous we'll dispose of it  
20 hazardous. If it's not hazardous we'll take it to a spac -  
21 special landfill. Site seven (7) and twenty-one (21) we're  
22 just going to propose institutional controls and monitoring.

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1 Ah we're going to restrict the groundwater use through Deed  
2 Restrictions. We're going to restrict construction of new  
3 wells and we're going to perform long term monitoring. And  
4 here is all our solvent pits. Ah again proposed action is  
5 institutional controls and monitoring. We're going to  
6 restrict the groundwater, restrict new wells and then  
7 perform long term monitoring. Site fourteen (14) we're  
8 doing two (2) actions. We're going to monitor the  
9 groundwater and then we're going to do soil remedy to  
10 complete the interim removal that we started back in 1996.  
11 Sites twenty-one (21) and thirty (30) has no groundwater.  
12 It's strictly a soil remedy. And we're just going to  
13 excavate the soils and dispose of them in appropriate  
14 landfill. Here you see ah the preferred alternatives,  
15 you'll see total costs that it's going to take for us to  
16 monitor it, to remove it and then you have present net  
17 worth. And you see over the monitoring period we're  
18 expecting to expend nine million eight hundred and forty  
19 dollars (\$9,840,000) over the next few years to achieve  
20 clean up. And now this is where you can stand up and have  
21 questions if anybody has questions. I know the RAB has  
22 provided their comments on the Proposed Plan. IDEM and EPA

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1 have. Ah does the public have any questions, comments? If  
2 you would - yes Richard?

3

4 **MR. RICHARD HILL:**

5 Did you need to say something first Paul?

6

7 **MR. PAUL CLOUD:**

8 Yeah let me - let me take the mic. Thank  
9 you Brooks. Ah at this time we will start with the people  
10 that have signed in on the ah speaker's list and the first  
11 person we have is Richard Hill. Richard if you would speak  
12 into the mic and identify yourself and ah make whatever  
13 comments you would like to make.

14

15 **MR. RICHARD HILL:**

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17 My name is Richard Hill. I'm co-chair of  
18 the RAB and as was pointed out earlier the RAB did supply  
19 comments to the Proposed Plan earlier on. And ah we did  
20 this in conjunction with ah our ah TAPP provider, Henshel  
21 Envirocom. We got input from them on it also. And so ah we  
22 ah submitted comments and they've been incorporated into the

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1 Plan and we appreciate that. Ah tonight I'm - I'm taking my  
2 RAB hat off and ah going more as a member of the community  
3 and also as a representative of Save The Valley, a local  
4 environmental organization. We did discuss this at our ah  
5 board meeting last week. I had put together some new notes  
6 on the Proposed Plan ah just things that ah I had come up  
7 with since the RAB submitted its comments. And ah we just  
8 wanted to say a few things. We wanted to say that we  
9 appreciate the opportunity to comment on the Proposed Plan  
10 and appreciate the hours of work. That doesn't even touch  
11 it saying hours, but however long that's been put in over  
12 the years by the Army and its contractors and the Corps and  
13 EPA and IDEM and everybody else to get us to this point. Ah  
14 I do want to say as a community organization that we are -  
15 Save The Valley is going to submit some written comments by  
16 the 31st. Just to give you an idea we are in concurrence  
17 with probably ninety-nine (99) percent of what ah - what is  
18 being proposed. Ah we think that in general the Army has -  
19 has done a good job and everybody else that's been involved  
20 too. I don't want to give them all the credit. Ah so I - I  
21 do have a question rather than keep rambling on here. Ah I  
22 don't know if I can get this answered tonight. Ah

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1 concerning Site twelve A (12A) ah the building 602 solvent  
2 pit. When I looked at the, and I just never - didn't notice  
3 this before when several other times I've looked through  
4 this, ah the dollars figures given in tables four (4) under  
5 the present net worth for alternative three (3) shows an  
6 amount that's less than the amount given for alternative two  
7 (2). I wondered if that - that's correct. And if so why?  
8 That just doesn't make sense. It's not logical you know.

9

10 **MR. BROOKS EVENS:**

11 The Madison Courier caught the typo. Which  
12 one (1) is it?

13

14 **MR. RICHARD HILL:**

15 I didn't even write it down. I just made a  
16 note that it's on table four (4) and didn't look right.

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18 **MR. BROOKS EVENS:**

19 Yeah Peggy called me on it too and we had a  
20 typo - typo I think alternative two (2).

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22 **MR. RICHARD HILL:**

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1                                   It says six hundred eighty-eight thousand  
2                                   (\$688,000) .

3

4                                   **MR. BROOKS EVENS:**

5                                   Yeah.

6

7                                   **MR. RICHARD HILL:**

8                                   For alternative two (2) and eighty thousand  
9                                   two hundred ten (\$80,210) for --

10

11                                  **MR. BROOKS EVENS:**

12                                  That's a typo. It should be eight hundred  
13                                  and nine thousand (\$809,000) for alternative.

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15                                  **MR. RICHARD HILL:**

16                                  Okay.

17

18                                  **MR. BROOKS EVENS:**

19                                  That's - that Peggy - Peggy in her diligence  
20                                  caught - caught that typo and ah we should have highlighted  
21                                  that and we should have made that aware during the public  
22                                  comment period. But yeah alternative three (3) for twelve A

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1 (12A) should be eight hundred nine thousand (\$809,000).

2 **MR. RICHARD HILL:**

3 Eight hundred and ninety (\$890,000) or eight  
4 hundred and nine (\$809,000)?

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6 **MR. BROOKS EVENS:**

7 Should have been eight hundred and nine  
8 thousand (\$809,000). Eight o nine (809).

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10 **MR. RICHARD HILL:**

11 Okay. That's it.

12

13 **Mr. PAUL CLOUD:**

14 Okay. The next speaker signed up is Ms.  
15 Karen Mason-Smith, Region 9, EPA. Karen?

16

17 **MS. KAREN MASON-SMITH:**

18 Hi. First of all I want to say thank you  
19 for the opportunity to provide comments and ah can everyone  
20 hear me? I know my voice is soft and I'm also getting over  
21 bronchitis. Can everyone hear me? Okay. I just have a few  
22 - a few comments as Richard stated and Paul and Brooks

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1 stated earlier ah the EPA and IDEM and the community did  
2 reach an agreement on the ah - most of the alternatives that  
3 were selected or the remedies selected in the Feasibility  
4 Study or I'm sorry, the Proposed Plan. Ah I have a couple  
5 of comments. EPA will provide written comments by March  
6 31st. I'm just here to share this with the public. And two  
7 (2) of the particular comments that we think are significant  
8 include ah we did not agree with - there were several of the  
9 sites in the Remedial Investigation that we ah do not agree  
10 should have no further action. We believe that those sites  
11 still have not been proven to - enough evidence has not been  
12 provided to show us that no further Remedial Action is  
13 needed. So going back to our general comment number one (1)  
14 is the statement you know we - we pretty much have the same  
15 comment that we had initially. Ah our initial comment to  
16 the Army was to change the title of the Proposed Plan  
17 because we felt that we would concur with the fifteen (15)  
18 sites that are - that are in the Proposed Plan. The Army's  
19 response to us was to include the other approximately thirty  
20 (30) sites. I forget the number. It did total fifty (50)  
21 sites. What is it about thirty-five (35) sites?

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**MR. BROOKS EVENS:**

Thirty-seven (37).

**MS. KAREN MASON-SMITH:**

What is it? Thirty-seven (37) sites. Ah some of those we do agree with no further action but there are also some that were unresolved. So I wanted to let the public know that because the Proposed Plan as it stands states that the EPA is in concurrence. And we concurred with the fifteen (15) sites but we don't concur with the Proposed Plan as it's written. Ah but we thought that the Army should have done a separate Record of Decision on those sites and we could have concurred with those. But since the other thirty-five (35) sites are wrapped into this document we don't concur with that. The second issue is regarding antimony. Ah there was a comment that we had which was general comment number five (5) and ah we just gave one (1) example of the type of munition site where antimony could be

1 found, which is a small ammunition site. That's not the  
2 only site of ammunition site associated with antimony. I  
3 wanted to come here and state that to the public today. Ah  
4 we still believe that because the antimony, all of the  
5 antimony data was rejected in the Remedial Investigation.  
6 Ah at this point in time we still believe that antimony  
7 needs to - that the Army needs to re-sample for antimony.  
8 Going back to one (1) of our comments on the Feasibility  
9 Study regarding antimony ah the Army agreed to address the  
10 lack of usable antimony data in the uncertainty section of  
11 the RI report. Also for the Feasibility Study sites they  
12 were carried forward. However, ah it doesn't appear that  
13 all of the discussions pertaining to antimony data  
14 adequately address the potential impact on human health or  
15 ecological risks. Ah there are a few sites and I don't have  
16 those sites to date. Those will be provided in our written  
17 comments by March 31st. But of those thirty-five (35)  
18 Remedial Investigation sites that I mentioned before some of  
19 those we believe are examples of why the antimony should be  
20 sampled. Also it's not clear form the information presented  
21 in the Remedial Investigation whether antimony was included  
22 as an analyzer in confirmatory sampling for ah some of the

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1 other Removal Action sites. Now we're not as concerned  
2 about those but we are concerned about those sites that are  
3 going to be cited in the Record of Decision for no further  
4 action. Also ah the EPA during the Remedial Investigation  
5 stage asked the Army to address the rejected antimony data  
6 in the uncertainty sections of the RI. I have a direct  
7 quote from the uncertainty section in the RI. It states:  
8 quote, the absence of antimony analytical data may  
9 underestimate risks to human health and ecological  
10 receptors, unquote. Ah in the - it is the EPA's belief that  
11 these statements do not explain whether antimony would have  
12 the potential to pose additional risk to human health or  
13 ecological receptors at present. And also I wanted to - to  
14 state that - I have a few references. Ah one (1) of them is  
15 the Agency for Toxic Substances and Disease Registry and  
16 they have a toxological profile sheet that you can find on  
17 the web site. Ah and that web site is  
18 [www.atsdr.cdc.gov/toxprofiles/tp23.html](http://www.atsdr.cdc.gov/toxprofiles/tp23.html) and in that  
19 toxological profile it goes on to explain some of the  
20 different uses of antimony. And antimony usually - if used  
21 alone it breaks easily but it's usually mixed as a metal  
22 alloy. It can be used in lid storage, batteries, ah solder,

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1 sheets and pipe metals, tanning, casing, pewter. Ah  
2 antimony outside is added to textiles, plastics to prevent  
3 them from catching fire. It's used in paints, ceramics,  
4 fireworks which ah we know the Jefferson Proving Ground used  
5 pyrotechnics and also in enamels for plastics, metals and  
6 glass. It's also associated with - it's used on the shell  
7 casings for munitions and also used in incinerators. And we  
8 have building - site number one (1) I think was an  
9 incinerator. So we agree with the Army regarding including  
10 antimony as a - with the samples, the metal samples and the  
11 confirmatory samples for the fifteen (15) ah FS sites that  
12 went forward into the Proposed Plan. But again we do not  
13 believe that at this stage ah the Army has provided enough  
14 justification and documentation as to why all those samples  
15 that were rejected and unusable in the Remedial  
16 Investigation should not be sampled. Ah the response to our  
17 comment, if I can find it - just a minute - the response to  
18 our comment from the Army was "that antimony is not a  
19 contaminant of concern unless it was produced at the subject  
20 site by the industrial world such as in tanning industries  
21 and other like industries". So since this is not the case  
22 at JPG, no further analysis were - other than metals

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1 confirmation testing at excavation sites necessary. So that  
2 was the response and ah that's why you know I've provided a  
3 comment to that. It's associated with other things besides  
4 tanning industries. Small arms ammunition sites are - was  
5 just an example, one (1) example of the type of sites that  
6 antimony is associated with. And ah the very last comment  
7 that I have or basically came from the presentation today.  
8 And ah as the Army was presenting the FS Alternative  
9 Evaluation and they went through the CERCLA Evaluation  
10 Criteria it was brought to my attention that the modifying  
11 criteria only includes IDEM acceptance and community  
12 acceptance. And this was one (1) of our older comments. We  
13 haven't had this one (1) in a while because to my knowledge  
14 I thought that the BRAC clean up team, the Jefferson Proving  
15 Ground BRAC clean up team, their project team, had reached a  
16 consensus during our technical team meeting that as a team  
17 member of the BRAC clean up team the EPA should also be  
18 added. And we have been an integral part of this whole  
19 process. That's my last comment.

20

21 **MR. PAUL CLOUD:**

22 Okay thank you Karen. That completes the

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1 list of ah signed in speakers on our sign up sheet. At this  
2 time if anyone else would like to speak and add their verbal  
3 input at this time ah the time is now. If you would please  
4 raise your hand and we'll have someone come to you with a  
5 mic. I would ask that you identify yourself and then make  
6 whatever verbal comments you have. Seeing as how no one  
7 (1) has raised their hand ah I believe our meeting is  
8 concluded. I would like to thank everyone who has come. Ah  
9 if you're not on our mailing list ah if you've signed in on  
10 the attendance sheet which I have I will make sure that  
11 you're added so that on future meetings, whether they're RAB  
12 or any other Army meeting, you're so notified of their time,  
13 date and location and you can attend if you so choose. Ah  
14 without further ado I close this meeting and thank you very  
15 much.

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17 CONCLUSION OF HEARING

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20 **C E R T I F I C A T E**

21 STATE OF INDIANA )  
22 ) SS:  
23 COUNTY OF JEFFERSON )

1 I, Sharon Shields, do hereby certify that I am a  
2 Notary Public in and for the County of Jefferson, State of  
3 Indiana, duly authorized and qualified to administer oaths;  
4 That the foregoing public hearing was taken by me in  
5 shorthand and on a tape recorder on March 23, 2004 in the  
6 Madison-Jefferson County Public Library, 420 West Main  
7 Street, Madison, IN; That this community hearing was taken  
8 on behalf of the Jefferson Proving Ground pursuant to  
9 agreement for taking at this time and place; That the  
10 testimony of the witnesses was reduced to typewriting by me  
11 and contains a complete and accurate transcript of the said  
12 testimony.

13 I further certify that pursuant to stipulation by and  
14 between the respective parties, this testimony has been  
15 transcribed and submitted to the Jefferson Proving Ground  
16 Restoration Advisory Board.

17 WITNESS my hand and notarial seal this \_\_\_\_\_ day of  
18 March, 2004.

19 \_\_\_\_\_  
20 Sharon Shields, Notary Public  
Jefferson County, State of Indiana

21 My Commission Expires: July 2, 2007

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