



ROSEMERE NEIGHBORHOOD ASSOCIATION

P.O. Box 61471, Vancouver, WA 98666 www.RosemereNA.org (360) 906-8810

June 21, 2006

Governor Christine Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Fax (360) 753-4110

Re: Camp Bonneville – for the Governor’s review, not to be deferred to the Department of Ecology

Dear Governor Gregoire,

The board and members of the Rosemere Neighborhood Association, who have been active in the Camp Bonneville issue for the past few years, are writing to you to express their concerns and respectfully request that you **not** approve the dirty transfer of this contaminated property to Clark County. Like you, the Rosemere Neighborhood Association is dedicated to the protection of our natural resources, and we have a lot of experience with water quality and other environmental issues. We are working partners with the Columbia Riverkeeper and our work has been supported by other environmental groups throughout the state. We have also been working for several years with EPA Region X and the State Department of Ecology on several issues, including Camp Bonneville. We have participated with Vancouver Lake Watershed Partnership, have aided in the Sole Source Aquifer Designation for protection of the Troutdale Aquifer, participate in water quality monitoring, and have been a plaintiff in Clean Water Act litigation in our community to help alleviate ground and surface water contamination.

The dirty transfer of Camp Bonneville to Clark County and its appointed clean-up team is a precedent setting action by which the Army will establish standards to dirty transfer excess military properties throughout the world. Camp Bonneville is already being quoted as the standard example for transfer of contaminated properties in Southeast Asia. This is a legacy that we, the citizens of Washington State, cannot afford. It is entirely dysfunctional and very dangerous to allow the intended re-use for this property, that of a free-range public park, to be established using weak institutional controls and a behavior modification practices to avoid the public’s contact with unexploded ordnance (UXO) and munitions of concern (MEC). It is absurd to plan for our children to play where the top several inches of soil is infused with toxic chemicals that have a shelf life of many decades, where chemical warfare was used, where documented groundwater contamination is in the path of public use of drinking water, where the Army has consistently failed to provide sufficient data to determine the nature and extent of UXO and MEC throughout the property, and where bombs will lay in perpetuity, separated from the public by a mere three strand barbed-wire fence that is easily breached by a person of average height. And worse yet, no comprehensive risk assessment has been performed relative to these conditions. It is also our contention that the negotiated amount for clean-up, a mere \$25 million (congress was quoted a far higher amount), will only result in budget constraints that will further hinder effectual remedial efforts. All in all, we firmly believe this dirty transfer is a really bad idea given the proposed re-use, and there

needs to be a hefty amount of additional accurate site characterization before anyone should consider signing their name to such a project.

We urge you to contact the EPA and request their input in this process. This is not an indication that the state is not performing the tasks to uphold clean-up requirements under MTCA. This request is simply made for you to have all expert opinions available to you prior to your making a decision. The EPA provided a letter outlining their concerns about Camp Bonneville and the lack of site characterization in 2003 (see attached three-page letter from EPA's Tom Eaton), and it is our opinion that the concerns outlined in that letter remain consistent with conditions at Camp Bonneville today. There is simply not enough credible information available today to determine an adequate cleanup plan, and going into such a proposal with significant data gaps is ill-advised. The EPA also cites superfund cleanup requirements under CERCLA that have been violated by the Army, and there needs to be more accountability on this issue.

Furthermore, a great deal of significant information has come forward about Camp Bonneville that has not been included in the Army's 2001 Environmental Assessment (EA), and the EA needs to be updated with additional study. The EA was based on documents from the mid to late 1990's, and does not include information about the documented groundwater plume, tribal concerns regarding the potential for aboriginal finds on site, testimony that Howitzer missiles were observed leaving the camp perimeter and landing in an area now developed into a residential neighborhood, the lack of a secure perimeter fence since the early to mid 1990's that allowed for easy public access and exposure to harm, new finds of grenade ranges and chemical warfare training, the lack of a comprehensive fire response and prevention plan that includes UXO, and a host of other serious oversights. Testimony has also been noted in the past that Camp Bonneville may have been the recipient for Hanford waste that could have been buried on site in the 1950's, and there has been no reliable radiological assessment conducted to determine if this is a problem. Nobody really knows what is buried out there, or where. There has been no reliable model to date that has been used to adequately determine how much UXO exists in the central impact area, let alone the toxic contamination caused by explosives at the firing points as well as the impact points. It is our opinion that the Army has not done a good job in handling this clean-up project, and it is far too risky to the community at large to enter into this dirty transfer contract with so many unanswered questions. A more elaborate Environmental Impact Statement is truly needed here to help identify the best possible cleanup options.

We have urged the Clark County Commissioners to hold a public hearing wherein the community can voice their concerns, but this request has been denied various times. There is concern that the decision process on this project has not been as transparent as it should be, and an arbitrary deed transfer date of July 1, 2006 is entirely premature. There are definitely a great many people in our community who are horrified about this transfer of contaminated property, and we urge you to take a step back from this process, slow it down, and ask for more information.

Those of us who have lived with this issue over the years have accumulated a great deal of research, documentation and testimony, and it would relieve a lot of anxiety if we could have an audience with you and your staff to bring collective wisdom to the table. It is very reasonable for members of the community to be concerned about this dirty transfer, and it is feasible for these concerns to be legitimately heard and suitable action taken. Something better needs to come of Camp Bonneville, and we can all help find a better solution.

Sincerely,

Dvija Michael Bertish, Chairman, Rosemere Neighborhood Association
Member, Columbia Riverkeeper
Member, Camp Bonneville Restoration Advisory Board

attachment included



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 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	

Enclosure 1:

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.
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