



January 27, 2005

Mr. Victor Ordija, P.E.
Vice President and Project Manager
Sporting Goods Properties, Inc.
1207 Prospect Drive
Stratford, CT 06615

Dear Mr. Ordija:

The Arkansas Department of Environmental Quality (ADEQ) and United States Environmental Protection Agency Region 6 (EPA) together have determined that the Remington Arms Company, Inc. plant site ("the Property") in Lonoke, Arkansas has successfully completed its voluntary participation as an ADEQ/EPA Corrective Action Strategy (CAS) streamlining project. Now that the project is successfully completed, EPA and ADEQ are issuing a Ready for Reuse Determination to the facility as an acknowledgment that remediation activities have been completed in accordance with the CAS Risk Management Plan (RMP) and the ADEQ Remedial Action Decision Document (RADD) and that environmental conditions on the property are protective of human health and the environment based on its current and future use as a small arms ammunition manufacturing facility.

EPA and ADEQ would like to congratulate the Remington Arms Company, Inc. (RAC) and Sporting Goods Properties, Inc. (SPGI) for their hard work and dedication implementing the corrective action streamlining principles outlined in the CAS (i.e., faster, focused and more flexible cleanups, fostering creative solutions to cleanups, etc.). The project team demonstrated that meaningful environmental results could be achieved quickly through the use of performance based objectives, program flexibility and practical approaches, innovative site investigation and remediation techniques, along with frequent and informal communication. The Lonoke facility (a National Corrective Action Streamlining Pilot Project) went from initial site investigation to remedial completion in under three years.

The Property is a sporting ammunition manufacturing facility located east of Little Rock in Lonoke County at the junction of Interstate 40 and Arkansas State Highway 15. The facility is surrounded by farming and agricultural land. Significant features on the property include the main manufacturing area, primer manufacturing area, closed surface impoundments, and Bayou Meto. RAC produces rimfire, centerfire, and shot shell sporting ammunitions. The

manufacturing processes include electroplating, metal forming and fabrication, metal finishing, plastic processing, chemical explosive manufacturing, and ammunition assembly operations. The facility was constructed and began operations in 1969 as a wholly owned subsidiary of E.I. du Pont de Nemours. Ownership of the manufacturing plant and a majority of the property were transferred to Clayton, Dubilier, and Rice, Inc. in December 1993 and today it continues to operate as RAC. DuPont, however, retained the Resource Conservation and Recovery Act (RCRA) cleanup responsibility at the Property, and is represented in this regard by Sporting Goods Properties, Inc. (a subsidiary of the DuPont Company).

On November 6, 2000, ADEQ, RAC and SGPI entered into a Letter of Agreement to address RCRA Corrective Action requirements for Solid Waste Management Units (SWMUs) using the Region 6 CAS. On December 1, 2000, RAC and SGPI submitted a Notice of Intent to ADEQ describing their intended application of the CAS. On January 23, 2001, EPA, ADEQ, RAC, and SGPI participated in a scoping meeting addressing past waste activities, current site conditions, a conceptual site model, and proposed investigative activities. The scoping meeting resulted in the preparation of the CAS Work Plan dated April 24, 2001. Following approval of the plan, SGPI performed investigative activities throughout 2001 and 2002, and completed ecological screening on January 10, 2002. SPGI submitted investigation progress and completion reports on January 10, 2002 and June 28, 2002, respectively, to document field activities supporting delineation of constituents of concern. The EPA, ADEQ, RAC, and SGPI held a RMP review meeting on February 10, 2003 that outlined RAC's approach to managing potential risks associated with SWMUs requiring cleanup. SPGI submitted the RMP on March 21, 2003. ADEQ issued the RADD for corrective action on April 11, 2003, followed by a 30-day public comment period. After verifying that no comments were received, SPGI began implementing the RMP and RADD provisions. In November 2003, SPGI initiated corrective measures as defined by the RADD, involving the excavation and off-site disposal of impacted soil, completing them in March 2004. Copies of the documents cited above may be obtained from ADEQ or RAC at the addresses provided in Enclosure 1.

Corrective action activities at the site included excavation and treatment of approximately 6,080 cubic yards of lead-impacted soils from SWMUs. Currently the property is in industrial use. As such, lead-impacted soils were remediated to industrial standards to prevent any potential exposure to on-site workers. Therefore, an institutional control, in the form of a deed notice, was filed with the Lonoke County Clerk to document the appropriate use of the site as industrial.

Additional information concerning the current environmental conditions of the site (i.e., concentrations of contaminants present and their associated risks) and risk management activities conducted to ensure protectiveness are further summarized in Enclosure 2. If conditions at the site change, including environmental conditions, land use, site receptors, and remedy performance, it will be necessary to revisit this determination of suitability for reuse to ensure its continuing protectiveness. The undersigned expressly reserves all rights and authorities to require future action by owners or operators if new or additional information comes to light that

materially impacts this Ready for Reuse Determination, whether such information is known as of this date, or is discovered in the future.

Congratulations on this most noteworthy accomplishment!

Sincerely yours,

Marcus C. Devine
Director
Arkansas Department of Environmental Quality

Richard E. Greene
Regional Administrator
EPA Region 6

Enclosures

**ENCLOSURE 1
AGENCY CONTACTS**

For information concerning the Ready for Reuse Determination, please contact:

Ms. Jeanne Schulze
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Please direct media inquiries to the ADEQ Customer Service Division at (501) 682-0923, or to the EPA.

ENCLOSURE 2
Current Environmental Conditions Table
for Remington Arms Company, Inc.
Lonoke, AR

Name	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Cleanup Status	Cleanup Standard	Institutional Control(s) (Type/Purpose /Location)
SWMU 5 – Old Burn Area	Surface soils to approx 1 ft. depth were excavated, stabilized and sent off-site for disposal at a non-hazardous landfill (279 CY)	Lead lower than 1,400 ppm	Completed March 2004	Lead in soil exceeding 1400 mg/kg	Deed notice for industrial use, Lonoke County Courthouse
SWMU 6A – 6D – Kill Tanks	No further Action	All less than industrial screening levels	Completed June 2002	Not Applicable	Deed notice for industrial use, Lonoke County Courthouse
SWMU 7A/10 – Landfill A and Forced Air Incinerator	<p>200 CY of concrete disposed of off-site as non-hazardous</p> <p>20 CY of soil and lead shot disposed of off-site in a hazardous waste landfill</p> <p>Exposed gravel near popping furnace capped with concrete</p> <p>Soil from 0-5 ft. depth were excavated, stabilized and sent off-site for non-hazardous disposal (5,710 CY)</p>	Lead lower than 1,400 ppm	Completed March 2004	Lead in soil exceeding 1400 mg/kg	Deed notice for industrial use, Lonoke County Courthouse
SWMU 7B – Landfill B	Surface soils to approx 1 ft. depth were excavated, stabilized and sent off-site for disposal at a non-hazardous landfill (41 CY)	Lead lower than 1,400 ppm	Completed March 2004	Lead in soil exceeding 1400 mg/kg	Deed notice for industrial use, Lonoke County Courthouse
SWMU 7C – Landfill C	Surface soils from 0-3 ft. in depth were excavated, stabilized and sent off-site for disposal at a non-hazardous landfill (50 CY)	Lead lower than 1,400 ppm	Completed March 2004	Lead in soil exceeding 1400 mg/kg	<p>Deed notice for industrial use, Lonoke County Courthouse</p> <p><i>Chart continues on next page</i></p>

Name	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Cleanup Status	Cleanup Standard	Institutional Control(s) (Type/Purpose /Location)
SWMUs 7D and 7E – Landfills	No Further Action	All less than industrial screening levels	Completed June 2002	Not Applicable	Deed notice for industrial use, Lonoke County Courthouse
SWMU 8A – Retention Basin	No Further Action	All less than industrial screening levels	Completed June 2002	Not Applicable	Deed notice for industrial use, Lonoke County Courthouse
SWMU 8D – Concrete Cyanide Holding Tanks	No Further Action	All less than industrial screening levels	Completed June 2002	Not Applicable	Deed notice for industrial use, Lonoke County Courthouse
SWMU 17 – Construction Dump Site	No Further Action	All less than residential screening levels	Completed June 2002	Not Applicable	Not Applicable