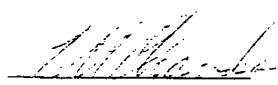



Ohio Environmental Protection Agency (OEPA)

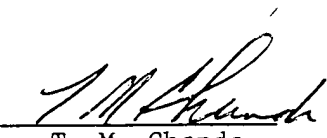
And

Ravenna Army Ammunition Plant (RVAAP)

1986 Correspondences

TELEPHONE OR VERBAL CONVERSATION RECORD		DATE
For use of this form, see AR 340-15; the proponent agency is The Adjutant General's Office.		10/8/86
SUBJECT OF CONVERSATION		
OH EPA Groundwater Monitoring Well Program F/Sanitary Landfill		
INCOMING CALL		
PERSON CALLING	ADDRESS	PHONE NUMBER AND EXTENSION
PERSON CALLED	OFFICE	PHONE NUMBER AND EXTENSION
OUTGOING CALL		
PERSON CALLING	OFFICE	PHONE NUMBER AND EXTENSION
T. M. Chanda	Environmental Engineer	216-297-3221
PERSON CALLED	ADDRESS	PHONE NUMBER AND EXTENSION
Dave Budd	OH EPA - N.E. District Office Div. of Solid & Haz. Waste Twinsburg, OH	216-425-9171
SUMMARY OF CONVERSATION		
<p>After receiveing Mr. Budd's letter 30 Sept. 1986, it was uncertain as to what criteria was required of the preliminary design submittal for the groundwater monitoring wells at RVAAP's landfill. The following provides the guidance:</p> <ol style="list-style-type: none"> 1. The groundwater monitoring wells do not have to be in place and functional until 30 June 1987. The preliminary design submittal has to be made early enough so that OH EPA can have time to review the design plan, make the necessary comments/recommendations, alter the plans to meet regulatory satisfaction, construct/install the wells and be ready to perform sampling and analyses by 30 June 1987. 2. The criteria for preliminary design submittal must include: <ol style="list-style-type: none"> a. Geohydrological study of RVAAP's landfill area which will locate and describe the subsurface aquifer most prominent as a drinking water supply source, the geology to that water source & the directional flow of the aquifer. If there's more than one prominent aquifer in the immediate landfill area, this must be noted as well. b. Once all geohydrological data has been accumulated, then determination has to be made as to proper site selection of the four monitoring wells (one upgradient and three downgradient). This determination of well sites must be made that most accurately affects groundwater sources as they would exist to leachate conditions within the immediate area of RVAAP's Sanitary Landfill. c. Also, the preliminary design data must also address the prescribed depth of wells, materials utilized for the construction of the wells, construction techniques employed (e.g. protection of wells from surface water runoff contamination) and sampling equipment. 3. After the preliminary design data is formulated to the above mentioned criteria, submittal should be made directly to Mr. Budd's attention. 		
cf: G. M. Demarest H. R. Cooper R. J. Kasper		 T. M. Chanda

TELEPHONE OR VERBAL CONVERSATION RECORD		DATE
For use of this form, see AR 340-15; the proponent agency is The Adjutant General's Office.		October 30, 1986
SUBJECT OF CONVERSATION Groundwater Monitoring (GWM) Program at RVAAP's Sanitary Landfill Preliminary Design Submittal		
INCOMING CALL		
PERSON CALLING	ADDRESS	PHONE NUMBER AND EXTENSION
PERSON CALLED	OFFICE	PHONE NUMBER AND EXTENSION
OUTGOING CALL		
PERSON CALLING	OFFICE	PHONE NUMBER AND EXTENSION
T. M. Chanda	Environmental Engineer	ATV: 346-3221
PERSON CALLED	ADDRESS	PHONE NUMBER AND EXTENSION
John Bauer	U.S. AEHA Groundwater & Solid Waste Aberdeen Proving Grds, MD.	ATV: 584-2024
SUMMARY OF CONVERSATION		
<p>Called John Bauer to find out if AEHA could provide a team to develop a preliminary design submittal as well as do the actual drilling for the monitoring wells at RVAAP's sanitary landfill. This action has circumvented from an OH EPA mandate issued 10/7/86 to RVAAP.</p> <p>After several discussions between Bauer, David Budd (OH EPA Northeast District Office, Solid Waste) and this office, its been determined that AEHA will be unable to perform the said activity. The major reason being that based upon the geohydrological setting of the landfill site and the expected well depths that OH EPA imposes upon these type settings, AEHA's available equipment is inadequate to successfully meet the designated parameters.</p> <p>This activity will require a RVAAP funding project encompassing the acquisition of a private contractor that can meet all prescribed regulatory guidelines prior to and following the preliminary design submittal made to OH EPA.</p> <p>Also what took place in the discussion between this office and AEHA was time schedules incurred in obtaining funds to purchase private contractor services. The opinion of AEHA was that the June 30, 1987 GWM well completion date would not be met due to time lost in procedural format of obtaining some type of Governmental Funds. This would detract from the optimal time table necessary to acquire pertinent data, formulate and submit the preliminary design submittal to OH EPA and their reviewal, respond to the recommendations of OH EPA and the final GWM well installation.</p> <p>Taking all this into consideration, this office contacted OH EPA (D. Budd). The OH EPA would allow a maximum six month extension on the present due date of June 30, 1987. However, this variance if requested, would have to be formally presented and accompanied by a descriptive milestone schedule.</p> <p>The extension date (December 30, 1987) would be a final and binding commitment; no extensions beyond that date. The extension request should only be used if it's necessary and if a practical timetable is unobtainable to meet the June 30, 1987 completion date.</p>		
cf: G. M. Demarest P. Revezzo R. J. Kasper File R. R. Cooper		 T. M. Chanda

TELEPHONE OR VERBAL CONVERSATION RECORD		DATE
For use of this form, see AR 340-15; the proponent agency is The Adjutant General's Office.		12/18/86
SUBJECT OF CONVERSATION 1986 Semi-Annual Groundwater Monitoring at RVAAP Sanitary Landfill		
INCOMING CALL		
PERSON CALLING	ADDRESS	PHONE NUMBER AND EXTENSION
PERSON CALLED	OFFICE	PHONE NUMBER AND EXTENSION
OUTGOING CALL		
PERSON CALLING	OFFICE	PHONE NUMBER AND EXTENSION
T. M. Chanda	RAI/RVAAP Environmental Engineer	297-3221
PERSON CALLED	ADDRESS	PHONE NUMBER AND EXTENSION
David Budd	Ohio EPA - NEDO Solid Waste Div. Twinsburg, OH	425-9171
SUMMARY OF CONVERSATION		
<p>Mr. Budd is not requiring RVAAP to submit groundwater monitoring (GWM) analytical results from its sanitary landfill for the last half of CY86.</p> <p>The reason for the dispensation is that the GWM Wells previously utilized to monitor chemical parameters (for 1st half CY86) do not exhibit actual groundwater conditions that are indigerous within the immediate area of the landfill.</p> <p>Budd felt that the analytical expenses could be better utilized in augmenting costs incurred from the development of the Formal GWM Program; which is required to be in place by June 1987.</p>		
 T. M. Chanda		
cf: G. M. Demarest R. J. Kasper H. R. Cooper R. E. Holford File		

RAVENNA ARSENAL, INC.

INTEROFFICE

October 13, 1986

TO MR. G. M. DEMAREST FROM H. R. COOPER

SUBJECT RCRA UNANNOUNCED INSPECTION - REFERRING TO LETTER OF
REGION V USEPA AND OHIO EPA

At about 10:00 AM, Thursday, October 9, 1986, three visitors appeared at the gate:

Catherine McCord	USEPA REGION V, Hazardous Waste Enforcement Section Phone: (312)886-1478/4435
April Katsura	USEPA REGION V, Hazardous Waste Enforcement Section
Don Easterling	OHIO EPA

The purpose of the visit was the unannounced annual inspection of both RAI and Load Line 6 for both agencies and to discuss a new interpretation by EPA of a facility. The interpretation is that the owner is the U. S. Army and the facilities are contiguous so only one permit, which can cover the activities of both, will be honored. The Load Line 6 permit number will be withdrawn and the RAI permit would be amended to include those activities.

I stated that as Operating Contractor having no control over a future lease, we do not agree with this. Ms. McCord said that we have the right to appeal the decision when we receive the letter of notification. However, she explained that they have already begun applying this interpretation to all Federal facilities (Joliet AAP was mentioned) and she didn't see much chance of change. They have found that the Federal landlords do not have enough knowledge of what the tenants are doing and this is EPA's only way of putting teeth in the enforcement of the rules.

In the inspection of RAI's records and facilities no significant problems were found. A few minor comments were made which will appear in the inspection report. These can and will be corrected before the written report is received.

It was learned by comments made during our inspection that an enforcement action has been started against Physics International (Load Line 6) for slow response to the last State inspection. I explained what I had heard to Ron Jordan who came out for the P.I. Inspection which was held on Friday, October 10.

A closeout was held with Mr. Kasper, Ron Jordan, Tony Meier and myself at 12:30 PM Friday. They said most, but not all, of the previous deficiencies (at Load Line 6) had been corrected but that a couple more had been noted. Primarily the need for continued action on the tank (checking surrounding soil for contamination) and the use in the past of an area of the demo grounds for burning. That location did not match their permit location and they did not use a pan. They have since discontinued that location but the EPA wants a closure plan (and possibly closure) of the previous site.

Re: RCRA UNANNOUNCED INSPECTION -
REGION V USEPA AND OHIO EPA

October 13, 1986

The inspection report will be sent within 30 days and a meeting will probably be scheduled in Chicago to establish a timetable for corrective action.



H. R. Cooper

HRC:jb

cf: R. J. Kasper
T. M. Chanda
File

TELEPHONE OR VERBAL CONVERSATION RECORD

For use of this form, see AR 340-13; the proponent agency is The Adjutant General's Office.

DATE

10/14/86

SUBJECT OF CONVERSATION

Consolidation Of Load Line #6 - Physics International's Hazardous Waste (HW) Activity With RVAAP's HW Activity - RCRA Permit

INCOMING CALL

PERSON CALLING	ADDRESS	PHONE NUMBER AND EXTENSION

PERSON CALLED	OFFICE	PHONE NUMBER AND EXTENSION

OUTGOING CALL

PERSON CALLING	OFFICE	PHONE NUMBER AND EXTENSION
T. M. Chanda	Environmental Engineer	ATVN: 346-3221

PERSON CALLED	ADDRESS	PHONE NUMBER AND EXTENSION
Ron Shinbori	AMCCOM - Environmental Rock Island, ILL.	ATVN: 793-1401

SUMMARY OF CONVERSATION

Informed Mr. Shinbori of U.S. EPA's - Region 5 Policy (as per above mentioned subject matter) which had been conveyed during an unannounced joint U.S. & Ohio EPA RCRA Inspection that was conducted on 9 & 10 October 86 at RVAAP. It was also mentioned during the EPA Inspection that the Joliet AAP Installation had already been served official notice of the HW activity consolidation policy and was presently in deliberation concerning the matter. At this time, RVAAP has been made aware that it too will receive the same type of notice.

The question posed to Mr. Shinbori was, "What is AMCCOM's response to this regulatory mandate." Mr. Shinbori's response was that he was aware of the situation with the Joliet AAP but was not familiar with specific details as to how the issue was going to be dealt with by AMCCOM; no definite guidelines have been established at this time.

Seeing that the issue is gaining momentum, Mr. Shinbori requested RVAAP to do the following:

1. Once RVAAP has received it's official notice to consolidate all HW Activities under one facility permit number, a copy of the notice should be forwarded immediately to AMCCOM Environmental.
2. Attach to the copy of the notice a cover letter asking what will be AMCCOM's guidance regarding the installation's responsibilities in responding to the regulatory agency's directive.
3. If the regulatory agency stipulates a short suspense date in response to the notice, then a letter should be forwarded to the EPA indicating that the installation (RVAAP) will require a time extension in order to convene with it's higher headquarters. This is in order to make response that's reflective of the decision making process formulated by the installation's authoritative command group.

Mr. Shinbori concluded the discussion by indicating hopefully that when RVAAP has received its official notice of EPA's policy decision, AMCCOM will have the necessary guidance/direction available to make the proper response.

cf: G. M. Demarest
H. R. Cooper

R. J. Kasper



T. M. Chanda

DA FORM 751 APR 68

REPLACES EDITION OF 1 FEB 58 WHICH WILL BE USED.



State of Ohio Environmental Protection Agency

Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171

Richard F. Celeste
Governor

31741
CME

November 25, 1986

RE: U.S. ARMY ARSENAL
PORTAGE COUNTY
OH5 - 210 - 020 - 736
and #02-67-0550

U.S. Army Arsenal
State Route 5
Ravenna, Ohio 44266

RECEIVED
OHIO EPA

Attn: Robert Casper,
Commanders Representative

DEC 03 1986

DIV. of SOLID & HAZ. WASTE MGT.

Dear Mr. Casper:

On October 9 and 10, 1986, Catherine McCord and April Katsura of the U.S. EPA and I conducted a hazardous waste inspection of your facilities at the Ravenna Army Arsenal. The inspection was conducted in order to determine compliance with both State and Federal Regulations for handling of hazardous wastes.

Since your facility is currently seeking a final hazardous waste permit, it is now necessary to resolve the outstanding permit issues. Until now, RAI has maintained interim status with the U.S. EPA, but has not received an Ohio Part A hazardous waste permit; while Load Line #6 has received an Ohio Part A hazardous waste permit, but has not received interim status with the U.S. EPA. Also, the Army has held two U.S. EPA hazardous waste identification numbers for this single property.

Since the part A applications for both operators (RAI and Load Line #6) list the U.S. Army as the owner, it appears that the Army has interim status with U.S. EPA and also has an Ohio part A hazardous waste permit. In the near future, the U.S. EPA and Ohio EPA will be concluding discussions on the permit issues and processing procedures which must be resolved so that the U.S. Army's hazardous waste activities can be permitted in a manner that is consistent with both State and Federal hazardous waste regulations.

The following violations and/or concerns were noted during our inspection of the Ravenna Arsenal Inc. operator:

1. We were unable to find written documentation of annual training for the person who inspects the hazardous waste storage facility. Documentation of personnel training is required by OAC 3745-65-16 and 40 CFR, part 265.16.
2. Although RAI has sent a letter to Robinson Memorial Hospital summarizing the contents of the contingency plan, the plan has not been submitted as required by OAC 3745-65-53 and 40 CFR, part 265.53.

The following violations and/or concerns were noted during our inspection of the Physics International-Load Line #6 operator:

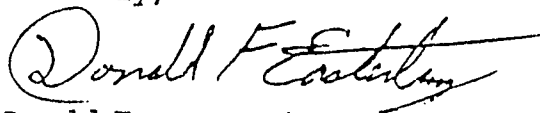
1. Although personnel training documentation has improved during the past year, these documents still do not list the job qualifications as required by OAC 3745-65-16 and 40 CFR, part 265.16.
2. The waste analysis plan is limited to a short discussion which concludes that no sampling is needed due to the fact that the properties of the original ingredients are known and that no change is expected during treatment of the wastes. In light of the recent findings that the resultant ash is reactive due to hydrogen sulfide it appears that this waste analysis plan is inadequate and does not meet the requirements of OAC 3745-65-13 and 40 CFR, part 265.13.
3. The contingency plan has not been submitted to local emergency authorities as required by OAC 3745-65-53 and 40 CFR, part 265.53.
4. The location of spill control equipment is not shown in the contingency plan as required by OAC 3745-65-52 and 40 CFR, part 265.51.
5. The spill control equipment and drums of red water were not inspected as required by OAC 3745-65-15 and 40 CFR, part 265.15.
6. The soils in the vicinity of the red water treatment tank still have not been investigated to determine the extent of contamination, if any, that may have occurred due to leakage from cracks in this tank. This is a violation of OAC 3745-65-15 and 40 CFR, part 265.15 which require immediate remedial action where a hazard is imminent or has already occurred.
7. Based upon the best available laboratory analysis procedures, the ash from open burning of the hazardous wastes also appears to be a hazardous waste. Therefore, the disposal area in the burning grounds must be considered a hazardous waste landfill until such time if ever, that additional testing proves otherwise. Unless additional testing proves that the waste ash is non-reactive, a closure plan for the ash disposal area must be submitted.

Items 6 and 7 above have been referred to the U.S. EPA for their action on these matters. Therefore, any correspondence or inquiries regarding these two items should be directed to U.S. EPA, Region V. For all other violations noted in this letter, please correct the violations and submit documentation for the corrections to this office within 30 days of receipt of this letter.

U.S. Army Arsenal
November 25, 1986
Page 3

I have enclosed documents which clarify details of the hazardous waste regulations referenced above. If you have any questions, please contact me at (216) 425-9171.

Sincerely,



Donald F. Easterling
Environmental Scientist
Division of Solid and Hazardous Waste
Management

DFE/sp

cc: Dave Mentzer, DSHWM, Central Office
~~John J. ... Vice President and General Manager~~
Ron Jordan, Deputy Division Director for Administration



State Of Ohio Environmental Protection Agency

Northeast District Office
2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171

RECEIVED

MAR 17 1986

G. T. WISELY

31420 ~~31488~~

29.00
Inspect



Richard F. Celeste, Governor

Re: Physics International Company
Portage County
OH 421 009 003
#02 67 0550
G/TSD

15

January 8, 1986

Physics International Company
Tactical Systems Group
P.O. Box 1004
Wadsworth, Ohio 44281 0904

Attn: Mr. A.W. Meier

Dear Mr. Meier:

On December 23, 1985, I conducted an inspection of the Physics International facility located at the Ravenna Army Arsenal. You represented this facility during the inspection. The facility was inspected for compliance with both State and Federal regulations for the handling of hazardous wastes.

The following violations and/or concerns were noted during the inspection.

1. Prior to the past few months, Physics International has been burning its K047/K044 and D003 hazardous wastes directly on the ground in the Ravenna Arsenal's demolition area. OAC 3745-51-03 (D) and (E) indicates that any wastes resulting from treatment of a characteristic hazardous waste is a hazardous waste until it is proven that the waste no longer exhibits hazardous waste characteristics. This section also indicates that any waste resulting from treatment of listed hazardous wastes is a hazardous waste until a formal delisting is granted by the Director. Since you have not presented analytical data characterizing the ash and have not received a delisting, your disposal of the ash is a violation of ORC 3734.02.

In order to properly handle your ash, you must conduct the burning in a device which will make it possible to collect the ash. The ash must be handled in the same manner that you would handle any hazardous waste until such time as analytical testing proves the ash is not characteristic and/or a delisting is granted.

2. The red water treatment tank has several small cracks which allow seepage of ground water into the tank when it is empty. Therefore, it may be possible for the tank to leak when filled. Please note that OAC 3745-65-15(c) requires the owner/operator to remedy deterioration of structures such as this.

Re: Physics International Company
Mr. A.W. Meier

Page Two

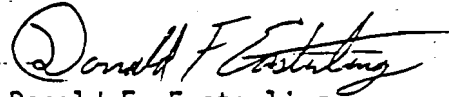
Please have a qualified engineer evaluate the condition of the treatment tank and the need for repair and/or lining of the tank. Copies of the engineer's report should be submitted to this office, filed with your closure plan, and incorporated into the closure plan if applicable.

3. Your personnel training records do not meet the minimum requirements of OAC 3745-65-16. All personnel noted in your training plan (revised 10-3-84) must receive annual training. The dates and content of the training as well as the names of the individuals receiving the training must be documented.

Within 30 days of receipt of this letter, please correct the above violations and submit documentation to this office describing the actions taken and the dates of each action.

Please advise me if you have any questions.

Sincerely,



Donald F. Easterling
Environmental Scientist
Division of Solid and Hazardous Waste Management

DFE:kr

Enclosure

cc: Kevin O'Grady, DSHWM, Central Office
✓ E.R. Berus, Physics International Company



Physics International Company

A Subsidiary of ROCKCOR

TACTICAL SYSTEMS GROUP

2148
2/9/86

March 10, 1986

Ohio EPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087-1969

Attention: Mr. Donald F. Easterling

Dear Mr. Easterling:

Reference: Your letter of February 21, 1986

We burned a quantity of our D003 material to obtain a sample of the ash for analysis. The material burned consisted of one 55-gallon drum of contaminated paper, boxes, rags, etc., with seven pounds of explosive dust (octol). The burning was done in a steel pan. The ash was mixed to insure uniformity and a sample of approximately one quart was sent to Wadsworth Testing Lab for analysis. A copy of their report is enclosed with this letter.

The treatment tank was inspected by a professional engineer on February 28, 1986. A copy of his report is also included with this letter.

The tank has been taken out of service until repairs can be made. We are presently obtaining estimates to install a liner in the tank.

Our records indicate that the tank was empty April, 1985 through December, 1985. Approximately 500 gallons of pink water was treated in January. The level of fluid was never over two inches during this period. It is possible that the lack of any fluid in the tank during December, 1985 was a major cause of these cracks. Normally the tank has some amount of warm fluid which would restrict the effects of ground freezing in the area close to the tank.

Sincerely,

Anthony W. Meier

AM/sr

Enclosures



**WADSWORTH/ALERT
LABORATORIES, INC.**

Sampling, testing,
consulting, mobile labs

HEADQUARTERS AND
LABORATORY
1600 Fourth Street, S.E.
P.O. Box 208
Canton, OH 44701
(216) 454-5808

LABORATORY
2121 Fourth Street, S.E.
Canton, OH 44701
(216) 454-1703

SOUTHEASTERN
REGIONAL OFFICE
744 Sunset Boulevard
West Columbia, SC 29169
(803) 794-6251

REGIONAL
LABORATORY
Route 3 - Box 235
Bartow, FL 33830
(813) 533-2150
(Shipping address)
Avenue D North
Bartow Municipal Airport
Bartow, FL 33830

24-Hour ALERT line
(216) 454-8304
In Ohio Call:
800-544-5588

REPORT OF ANALYSIS

Physics International Co.
901 Seville Road
P. O. Box 1004
Wadsworth, Ohio 44281-0904

Sample Description: Ash residue (Pan kumin)
Laboratory I.D. Number: 1466-11305
Date Sample Received: 2/24/86
Date of Report: 3/7/86

<u>Parameter</u>	<u>Concentration</u>	<u>Units</u>	<u>Detectable Limit</u>
Cyanide	19	mg/kg	
Flash Point	>180	°F	
Sulfide	7.200	mg/kg	
pH	10.2	s.u.	

Total Metals:

Arsenic	ND	mg/L	0.005
Barium	0.13	mg/L	
Cadmium	0.17	mg/L	
Chromium	ND	mg/L	0.02
Hexavalent Chromium	ND	mg/L	0.02
Lead	0.62	mg/L	
Mercury	ND	mg/L	0.005
Selenium	ND	mg/L	0.005
Silver	ND	mg/L	0.01

ND = (None detected)

Marvin W Stephens
Marvin W. Stephens, Ph. D. *mph*





RAVENNA ARSENAL INC.

A Subsidiary of Physics International Company

8451 STATE ROUTE 5
RAVENNA, OHIO 44266-9297

February 21, 1986

Telephone (216) 358-7111

Autovon 346-3210

THRU: Contracting Officer's Representative
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, Ohio 44266-9297

TO: State of Ohio Environmental Protection Agency
ATTN: Mr. Warren Tyler, Director
361 East Broad Street
Columbus, Ohio 43216-1049

Subject: Formal Request for Approval to Conduct Hazardous Waste
Thermal Treatment and Storage Activities at the Ravenna
Army Ammunition Plant (RVAAP)

Dear Sir:

In the past calendar year of 1985, the Ravenna Army Ammunition Plant (RVAAP) had submitted three separate documents requesting your approval to conduct RCRA thermal treatment activities. The referenced documents submitted to your attention were:

1. Formal Request for Exemption - State RCRA Part A, Re: Activity to Detonate 382 (ea.) 152MM Projectiles; July 9, 1985.
2. Formal Request for Approval to Perform Open Burning of Non-Recyclable Nitroguanidine; July 16, 1985.
3. Formal Request for Approval to Perform the Deactivation of the M720 Point Detonating Fuze; August 2, 1985.

All these requests were given approval to perform the mentioned RCRA activities.

The purpose of these requests resulted from the State's decision of non-issuance to RCRA Part A interim status following RVAAP's two submitted applications for attaining that status. It's apparent, that even though RVAAP maintains Federal EPA interim status, State compliancy must be addressed in any RCRA activity at this installation. Consequently, RVAAP has had to rely on Paragraph (G) of Section 3743.02 of the Ohio Revised Code to complete certain mission activities at RVAAP.

Presently RVAAP is making a RCRA Part B submittal to U. S. EPA for it's hazardous waste (HW) storage facility (Call-in date of February 1, 1986). This Part B submittal does not include thermal treatment activities intermittently conducted by RVAAP. Thermal treatment activities that evolve from munitions operations are still pending legislative action regarding policy and standards.

Re: Formal Request for Approval to
Conduct Hazardous Waste Thermal
Treatment & Storage Activities
at RVAAP (Cont'd)

February 21, 1986

-2-

RVAAP anticipates, that during the calendar year of 1986, there will be a need to conduct thermal treatment activities as well as utilize the HW storage facility to receive the containerized ash residue generated from the treatment processes. Obviously, in order to meet State compliancy with respect to mentioned RCRA activities, a formal request for approval by the OH EPA Director would have to be addressed for each activity.

On October 21, 1985, representatives from RVAAP: Mr. Robert Kasper, Mr. Thomas Chanda, Mr. Gary Holden, Mr. Anthony DiPuccio (RVAAP contracted Engineer), Mr. James W. Stamm (RVAAP contracted Engineer); representatives from the Ohio EPA: Mr. Robert Carey and Ms. Paula Cotter; and a representative from the Hazardous Waste Facility Review Board, Mr. Edward Lim; all met to discuss the upcoming RCRA Part B submittal from RVAAP and more importantly (the reason for this letter) was to find a more feasible approach to resolve the issue of conducting RCRA type activities without the continued generation of formal request documents for each specific activity. The main focal point of that discussion and what is now being presented by RVAAP within this letter is a "cover-all" type formal request for permittance to conduct thermal treatment activities for its three RCRA facilities and one hazardous waste storage facility for the remaining portion of the calendar year 1986. This request is made under Paragrph (G) of Section 3734.02 of the Ohio Revised Code in RVAAP's absence of State interim status. The basis for this type of request is to reduce the extensive amount of time experienced by both parties in regards to paperwork, processing, reviewal procedures and final administration responsibilities that would evolve with separate submittal requests.

For the matter of brevity to this request, RVAAP makes as a reference source, the three previous submittals; mentioned at the beginning of this letter. The anticipated thermal treatment activities of open burning (OB), open detonation (OD) and deactivation furnace for RVAAP in 1986 will reflect primarily identical situations as had been previously described in the reference sources. Each reference document provides to the reader an indepth discussion pertinent to purpose of activity, mechanics of operation, safety to human health and environment and adherence to both air and RCRA regulatory guidelines as they pertain to the thermal treatment of waste explosives and related manufactured items. These reference sources will be applicable to the intended RCRA activities at RVAAP since all items in question basically represent conventional weaponry composition.

The following sections presented provide anticipated activities in 1986 for the three thermal treatment sites and a descriptive summary of the hazardous waste storage facility.

Re: Formal Request for Approval to
Conduct Hazardous Waste Thermal
Treatment & Storage Activities
at RVAAP (Cont'd)

February 21, 1986

-3-

I. Deactivation Furnace - Thermal Treatment

This facility employs an oil-fired cylindrical retort to deactivate small arms ammunition, primers, fuzes, boosters, detonators and activators that contain no greater than 400 grains of explosive material for each item. The intended 1986 facility use includes:

1. 18,000 M720 Booster Charges - Project is to finish work description as prescribed within request letter to OH EPA Director titled: Formal Request for Approval from Ohio EPA to Deactivate M720 Point Detonating Fuze Assemblies; August 2, 1985.
2. The closest distance the deactivation furnace is to the property of others is 2,591 meters (8,500 ft.). Expected quantities to be processed through the deactivation furnace at any one time will easily meet quantity distances established by 40 CFR Part 265.382.
3. All ash residue from this process is properly containerized and transferred to the nearby hazard waste storage facility. The storage facility will be discussed later in this request.
4. The deactivation furnace presently has an Ohio EPA Permit (Application No. 1667060084 B034) to operate an air contaminant source. This permit is effective until October 10, 1988.

II. Open Burning - Thermal Treatment

This facility is utilized to open burn waste explosives and small ammunition items with minimal explosive elements (20-30 grains of explosive material) that cannot be effectively and safely demilitarized through the deactivation furnace. The process basically involves placing the waste explosive into one of four (each) - 4' X 60' X 10" sidewall depth metal tray constructed of one-quarter inch thick boiler plate. The explosive material will either be self supportive of combustion or will require dunnage (scrap lumber) to sustain heat requirements that will reduce the explosive element to a non-reactive state. The following includes proposed activity for CY 1986:

1. The closest distance the thermal treatment site is to the property of others is 2,896 meters (9,500 Ft.). Expected quantities to be open burned at any one time will easily meet quantity distances established by 40 CFR Part 265.382.

Re: Formal Request for Approval to
Conduct Hazardous Waste Thermal
Treatment & Storage Activities
at RVAAP (Cont'd)

February 21, 1986

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2. It's estimated 22,000 pounds of black powder (mixture potassium nitrate, charcoal and sulfur with a respective 75:15:10 proportionality) will have to be exposed to open burning in 1986. The material is suspect of not being able to meet ammunition standards as a raw explosive component.
3. 20,000 M720 fuze heads will have to be exposed to open burning. This item was previously processed through the deactivation furnace (Reference Request to Director Letter: Formal Request for Approval to Deactivate 20,000 M720 Point Detonating Fuze Assemblies; August 2, 1985). One section of the assembly did not detonate; the M17 detonator that contained 3.54 grains of lead azide and 1.23 grains of tetryl explosive compound. There wasn't enough dwell time or sustained heat exposure from the deactivation furnace to detonate the explosive components. Consequently, the sustained heat requirement can only be accomplished by the open burning process using a wood fire in metal pans.
4. The metal pans/trays that are utilized in this process captures all the generated ash residue. The ash residue is collected (minus the metal component which is separately inspected for assurance of detonation and transferred to a metal scrap and salvage station) containerized and then transferred to the nearby hazardous waste storage area. The storage facility will be discussed later in this request.
5. The reference document mentioned earlier Formal Request for Approval to Perform Open Burning of non-recyclable Nitrogua-nidine; July 16, 1985 will provide the reader with a more detailed account of aspects regarding RCRA, safety and handling as applicable to an open burning activity.
6. Along with approval from State EPA Director to perform mentioned RCRA thermal treatment, it is also required, prior to commencement of activity, to apply and receive an open burning permit from the State Regulatory Agency.

III. Open-Detonation

1. The only anticipated activity for this area in CY1986 is to detonate the remaining lot (282 each) of 152MM Projectiles as previously described in reference document Formal Request for Exemption - State RCRA Part A, RE: Activity to Detonate 382 (each) 152MM Projectiles; July 9, 1985.
-

Re: Formal Request for Approval to
Conduct Hazardous Waste Thermal
Treatment & Storage Activities
at RVAAP (Cont'd)

February 21, 1986

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III. Open-Detonation Cont'd

2. The closest distance the detonation area is to the property of others is 2,858 meters (9,375 feet). Quantities of explosives to be detonated through the process at any one time will easily meet quantity distances established by 40 CFR Part 265.382.

IV. Hazardous Waste Storage Facility

The facility consists of a concrete bunker/igloo with an earthen cover. The only material that this storage facility manages is ash residue from the deactivation furnace and open burning process and spent activated carbon generated from the explosive wastewater treatment process. The facility has a capacity to manage 72 (each) 55 gallon barrels of material at any one time. The facility is totally enclosed with a concrete floor. The facility contains no floor drains with no run-off or run-on water to manage. This storage facility has had its RCRA Part B called in and submitted on February 1, 1986. Three copies of the RCRA Part B Permit Application have been submitted to the Ohio EPA; Solid & Hazardous Materials Division. In order to shorten this discussion regarding the facility description, maintenance and operations, RVAAP would prefer that reference be given to the RCRA Part B Permit Application. The Part B submitted will provide in detail the actual operations and management of the storage facility as well as all RCRA compliances that must be met within the operation.

RVAAP is requesting an exemption approval to conduct RCRA activities (thermal treatment and storage) commencing from April 7, 1986 through December 19, 1986. This is based upon the mentioned activities that will be required to complete in CY 1986. RVAAP would, however, reserve the fact that as ammunition inspections do occur there may be a possibility for an unexpected thermal treatment activity. This would happen in an event that an explosive item/or material would not meet ammunition safety standards for storage. In this case, RVAAP would notify the OH EPA and indicate whether or not the activity would encompass the parameters of operation previously described in the referenced material. If the unexpected thermal treatment activity must employ a scope of demilitarization desensitizing activity not previously described, then RVAAP will subject to a prepared document detailing the operation and request separate approval beyond this present submittal.

RVAAP fully recognizes it's responsibilities as a RCRA facility and that mentioned activities will be conducted in such a manner as not to cause any adverse impact on human health or the environment. Also the proposed activities will meet the standards set forth within Ohio's EPA RCRA

Re: Formal Request for Approval to
Conduct Hazardous Waste Thermal
Treatment & Storage Activities
at RVAAP (Cont'd)

February 21, 1986
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regulations as well as maintain compliancy under present U. S. EPA
interim status permit #OH5210020736.


Sincerely,

RAVENNA ARSENAL, INC.



H. R. Cooper
Plant Engineer

Concurrence:


R. J. Kasper
Commanding Officer's Rep.

cf: Don Easterling
OH EPA - Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087

cf w/attachments: Edward Lin, Chairman
Ohio Hazardous Waste Facility Review Board
Box 1049
Columbus, Ohio 43216

ROUTING AND TRANSMITTAL SLIP

Date

28 Feb 1986

elephant

Reference 346-3710

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1. CDR, AMCCOM			
2. ATTN: AMSMC-ISE		cf: G. M. Demarest	
Jennifer Leonard		R. J. Kasper	
3.		T. M. Chanda	
4.		File	
5.			

Action	File	Note and Return
Approval	For Clearance	Per Conversation
X As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Ref: AMSMC-ISE ltr 18 Feb 1986, Subject: Biennial Report on Hazardous Waste Management Activities.

Subject reports for Ravenna Army Ammunition Plant are attached.

Copies have also been forwarded to AMCEN-A; Maj Jessie B. Cabellon.

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urvey

X Also provided for your information and file is the correspondence and Closure & Post Closure Plan for Hazardous Waste Treatment and Storage Facilities for Ravenna Army Ammunition.

or

ange -

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
H. R. Cooper, Plant Engineer, RAI	
R. J. Kasper, CR, SMCRV	Phone No. 3124

5041-102

☆ U.S. G.P.O. 1982-387-346

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.208

HRC:TMC:jb

4 Attachments

1. Generator Annual Waste Report
2. Facilities Annual Waste Report (Treatment)
3. Facilities Annual Waste Report (Storage)
4. NIWE Survey

cf: Mr. Don Easterling
OHIO EPA - Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087

CDR, AMC, Attn: AMCEN-A
CDR, AMCCOM, Attn: AMSMC-ISE

March 21, 1986

THRU: Contracting Officer's Representative
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, OH 44266-9297

TO: Commander
US Army Arsenal, Munitions and Chemical Command
ATTN: AMEMG-ISR (Nandy Grain)
Rock Island, IL 61299-6000

Subject: Hazardous Waste Permit Application
US EPA ID #OH5210020736 - Ravenna AAP

Dear Sir:

Attached for your retention is an information copy of subject submission made to Region V RCRA Activities, Chicago, IL by RAI letter 3/20/86.

Please note that cover sheets only are being included for Ravenna AAP Installation Assessment Report No. 132; Reassessment of Ravenna AAP Report No. 132R; and USAEHA Hazardous Waste Management Study No. 37-26-0442-84, since it is believed copies are on file at your command.

Sincerely

RAVENNA ARSENAL, INC.

H. R. Cooper
Plant Engineer

HRC:TMC:jb

Attachment

CERTIFICATION REGARDING POTENTIAL RESPONSE FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Ravenna Army Ammunition Plant

EPA I.D. NUMBER: OH5210020736

LOCATION CITY: Ravenna

STATE: Ohio

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u>X</u>	<u> </u>
• Surface Impoundment	<u>X</u>	<u> </u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u>X</u>	<u> </u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u>X</u>
• Injection Wells	<u>X</u>	<u> </u>
• Wastewater Treatment Units	<u> </u>	<u>X</u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u>X</u>	<u> </u>
• Other <u>Open Burning & Open Detonation</u> (both testing & demilitarization) Upon Land Surface.	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See Attachment #1 For Response To Item #2

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

- 3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

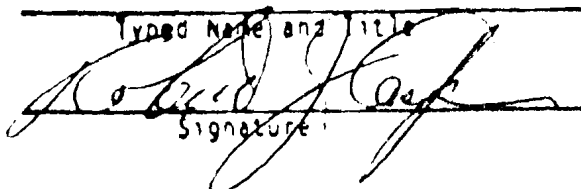
See Attachment #5 For Response To Item #3

- 4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

See Attachment #6 For Response To Item #4

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

R. J. KASPER
 COMMANDER'S REPRESENTATIVE

Typed Name and Title

 Signature


 Date