

Ohio Environmental Protection Agency (OEPA)

And

Ravenna Army Ammunition Plant (RVAAP)

1991 Correspondences



RAVENNA ARSENAL, INC.

8451 STATE ROUTE 5, RAVENNA, OHIO 44266-9297
TELEPHONE: (216) 358-7111 • FAX: (216) 297-3216

October 1, 1991

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

TO: Ohio Environmental Protection Agency
Mr. Donald R. Schregardus, Director
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Subject: 90-Day Extension Request For Implementation of
Groundwater Monitoring Program For Ravenna Army
Ammunition Plant's Closed Solid Waste Landfill

Dear Sir:

The Ravenna Army Ammunition Plant (RVAAP) is making the subject extension request in order to have additional time available to fully implement Ohio EPA's groundwater monitoring program as mandated by OAC 3745-27-10.

RVAAP closed its solid waste landfill, by formal notice to your agency in September 1989. Subsequent meetings with Ohio EPA district representatives were conducted to achieve physical closure. During these meetings RVAAP was assured that any proposed regulatory mandate would not be applicable with exception to a 30 year site maintenance/upkeep requirement. From these meetings RVAAP was under the impression that it would be obligated to comply with regulatory requirements for closure as stipulated by paragraph (c) of OAC rule 3745-27-10 as effective July 29, 1976 pertinent to groundwater monitoring requirements. RVAAP implemented the mentioned groundwater monitoring program incognizant of the new March 1990 Final Rule of OAC 3745-27-10. RVAAP maintained its groundwater monitoring compliancy within the parameters of a "grandfathered" site.

In late August 1991 during a facility inspection RVAAP was first informed of its expanded groundwater monitoring requirements as prescribed by the March 1990 revisions of OAC 3745-27-10.

The portions of the groundwater monitoring program that will be delayed are the sampling and analyses, implementation of a statistical analysis program, and the formulation of a groundwater quality assessment program.

The sampling and analyses will have to be delayed for at least 30 days. Being at the end of the Federal fiscal year which closes 30

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Sept. 1991, an annual contracted laboratory cannot be acquired until October 1991. Requests for bid have already been sent to the respective labs. It's anticipated the sample extraction and commencement of analyses should be underway by the end of October 1991.

The analysis of variance (ANOVA), is the selected RVAAP statistical analysis program. Ravenna will require at least ninety days to bring ANOVA into the groundwater monitoring program. Time allowances would be required for finding, purchasing, and learning the operational aspects of a ANOVA computerized program. The actual use of the ANOVA program will not occur until completion of 3rd quarter analyses or not later than May 1992; due to the amount of analytical data input to activate the statistical program. This use is based upon guidance from the 1989 publication Statistical Analysis of Groundwater Monitoring Data At RCRA Facilities Interim Final Guidance; EPA/530-SW-89-026; PB89-151047.


RVAAP's groundwater quality assessment program will require at least 90 days to be formalized. RVAAP has requested the technical services of the U.S. Army Environmental Hygiene Agency (USAEHA) to help formulate all phases of the assessment plan pertinent to equipment, procedures, and techniques. Again since it will require three quarters/three sets of well data in order to make any determination of a statistically significant increase from background values for any specified parameter, the assessment plan will have ample time to be properly developed which would include your agency's final review and approval.

RVAAP has all intentions of achieving compliance with the OAC 3745-27-10 Groundwater Monitoring Program. This extension request is needed to fully meet all levels of that compliance.

If additional questions should arise regarding this request please contact either the Government's Mr. Robert J. Kasper, Commander's Representative at 346-3124 or for the Contractor, Mr. Thomas M. Chanda, Environmental Engineer at 346-3221.

Sincerely,

RAVENNA ARSENAL, INC.


H. R. Cooper
Plant Engineer
TMC/wt/tc9133

cf: Ohio EPA, DSHM-NEDO
ATTN: Mr. William L. Black Specialist 2

cf: Commander, AMCCOM
AMSMC-ISE-M (Capt. William Metcalf)

cf: N. Wulff
T. Chanda
J. Mound
J. McGee
File



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

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FROM	
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RETURN FOR FILE	

S: 3/1/91

Richard F. Celeste
Governor

January 31, 1991

RE: RAVENNA ARMY AMMUNITION
PLANT (RVAAP)
PORTAGE COUNTY
OHD 210 020 736
TSD INSPECTION

CERTIFIED MAIL

Mr. Thomas M. Chanda
8451 State Route 5
Ravenna, Ohio 44266

Dear Mr. Chanda:

On November 30 and December 3 and 4, 1990, Mr. Paul Dolensky and I conducted a hazardous waste inspection of the RVAAP facility located at 8451 State Route 5, Ohio. You represented the facility during the entire inspection. Mr. Paul Cross of Physics International was present during the inspection conducted at Loadline #6 (LL #6) and Loadline #7 (LL #7). Mr. Norm Wulff, and Mr. Harold Cooper joined you and I on December 4, 1990 for the exit interview of the inspection.

The facility was inspected for compliance with Ohio EPA hazardous waste rules and regulations. A copy of the RCRA Interim Status Inspection form and the RCRA Land Disposal Restriction (LDR) Inspection are enclosed for your information.

As a result of the inspection, the following violations, concerns and comments were found and will require prompt attention:

VIOLATIONS

1. Accumulation Time of Hazardous Waste OAC 3745-52-34(C)

RVAAP is allowed to accumulate as much as fifty-five (55) gallons of hazardous waste in containers at or near any point of generation where waste initially accumulates, which is under the control of the operator of the process generating the waste, without a permit as long as the accumulation complies with the following:

- a) The accumulation complies with rules 3745-66-71, 3745-66-72, 3745-66-76, 3745-66-77 and 3745-66-73(A); and

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- b) The containers are marked either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

RVAAP accumulated hazardous waste in excess of fifty-five (55) gallons without complying with the labeling requirement of OAC 3745-52-34 (C) at the following locations:

- I. At LL #7 (Physics International) two fifty-five (55) gallon drums containing paint filters were located outside building 1B-13 without being under the control of the operator. This violation was corrected on December 3, 1990. Please submit pictures to document the location of the room and the drum and to demonstrate that it is under the control of the operator, closed and labeled with the word "hazardous waste".
- II. Two fifty-five (55) gallon drums containing greater than 55 gallons of hazardous waste located at building 1B-22 were being managed as satellite accumulation drums. One drum contained hazardous waste paint and the other contains hazardous waste solvents. Hazardous wastes are generated at building 1B-13 and accumulated at building 1B-22, which is operated as a satellite accumulation area per an agreement with Ohio EPA. However, RVAAP must keep building 1B-22 locked at all times in order to verify that the area is under the control of the operator of the process generating the waste.

RVAAP has accumulated hazardous waste in excess of 55 gallons at building 1B-22, in violation of rule 3745-52-34(C) of the OAC. Therefore, RVAAP shall correct this violation by ensuring that the quantity of each drum at building 1B-22 equals 55 gallons or less collectively.

- III. Two boxes located at the pouring area, LL #7, and at building 2F-7, LL #6, containing hazardous wastes D003 and K044 were not marked or labeled with the words "Hazardous Waste" or with identification of the content of each box in violations of OAC 3745-52-34 (C).

RVAAP corrected the violation at the pouring area, LL#7 by labeling the box with the word "Hazardous Waste" on December 3, 1990. However, the violation for the box at LL #6, was not corrected.

2. Accumulation Date OAC 3745-52-34(A)

RVAAP exceeded satellite accumulation quantity of 55 gallons of hazardous waste allowed in OAC 3745-52-34 (C). Therefore, RVAAP is in violation of rule 3745-52-34(A) of the OAC due to the failure to mark the date upon which each period of accumulation begin at the drums located in Building 1B-22 at LL #7.

Ohio EPA recommends that the violation be corrected in a manner will not allow a satellite accumulation drum to become an area that is subjected to less than 90 days accumulation area rules.

3. Management of Containers OAC 3745-66-73(A)

RVAAP failed to close a box containing hazardous waste explosives (D003), at the pouring area at LL #7.

RVAAP corrected this violation on December 4, 1990.

4. Accumulation Greater Than 90 Days Without a Permit
OAC 3745-52-34(B)/Ohio Revised Code (ORC) 3734.02(F)

RVAAP has stored hazardous waste drums at the less than 90 day accumulation areas in buildings W-221 and X-232 for greater than 90 days without obtaining a hazardous waste operating permit in violation of the Ohio Revised Code (ORC) 3734.02(F) and Ohio Administrative Code (OAC) 3745-52-34(B).

Ohio EPA understands that RVAAP is in the process of developing an administrative consent agreement with the Ohio EPA. The consent agreement will allow RVAAP to open burn/open detonate (OP/OD) without obtaining an emergency permit due to the lengthy time necessary of the permitting process. Yet, it shall continue to be RVAAP's responsibility and obligation to obtain these emergency permits until the consent agreement is signed. In cases where wastes must be stored for periods greater than 90 days, an extension must be requested from the Director.

Please submit the most recent inventory sheets for buildings X-232 and W-221 as part of your documentation to demonstrate that RVAAP is no longer in violation of this rule.

Mr. Thomas Chanda
January 31, 1991
Page -4-

5. Personnel Training OAC 3745-65-16(D)(2)

Physics International (PI), RVAAP's tenant, operates under RVAAP's hazardous waste identification number due to a U.S. EPA decision. However, PI has failed to provide Ohio EPA with written job descriptions for the hazardous waste duties assigned to each employee as required.

Please provide the agency with job descriptions and job titles for each employee involved in hazardous waste management for this portion of RVAAP operation.

6. General Inspection Requirements OAC 3745-65-15(B)(1) &(C)

RVAAP failed to develop a written inspection plan, in violation of rule 3745-65-15(B)(1) of the OAC. RVAAP has also failed to remediate a malfunctioning in the phone at Building 1601, in violation of rule 3745-65-15(C) of the OAC.

Please develop a written inspection plan and submit it to Ohio EPA. In addition, submit documents to demonstrate that RVAAP has familiarized the employees with the inspection plan. Ohio EPA recommends that all malfunctions and corrections be recorded in the space available on the inspection form.

7. Waste Analysis and Recordkeeping : OAC 3745-59-07 (A)(1)(b)

RVAAP has not included the corresponding treatment standard along with each land disposal restriction (LDR) notification accompanying shipments of hazardous wastes to the treatment facilities you deal with as required by rule 3745-59-07 (A)(1)(b) of the OAC.

CONCERNS

1. A drum located at the greater than 90 days storage area in building 1601, had a bent lid. You indicated that you would place it in an overpack. Please document that this has been completed.

Mr. Thomas Chanda
January 14, 1991
Page -5-

2. Buildings 1035 and 1036 contain a paint shop and an auto body shop. The auto body shop at building 1036 is not operational. However, the paint shop at building 1035 is used on a periodical basis. RVAAP uses a paint gun to paint. RVAAP was instructed that the waste solvent generated from the cleaning of the paint gun must be managed as hazardous waste. Therefore, Ohio EPA instructed RVAAP to start accumulating this solvent in a manner that will comply with OAC 3745-52-34(C).
3. RVAAP has requested to utilize two locations for satellite accumulation containers at both LL#6 and LL#7 for the same process. RVAAP made this request due to the hazard involved with the operation of explosives. Hazardous waste rags (D003) are generated at these two loadlines.

The two locations for LL#6 are buildings 2F-7, which contains a five (5) gallon trash can at the point of generation, and 2F-3, which contains one fifty five (55) gallon drum near the point of generation. The two locations for LL#7 are three (3) five (5) gallon containers at the point of generation in the cleaning room of building 1B-13 and a side room near the point of generation in building 1B-13.

It was noted that the first satellite accumulation containers at each loadline are at the point of generation and in compliance with rule 3745-52-34 (C) of the OAC. However, the second satellite accumulation drum at each loadline is not under the control of the operator as required by OAC 3745-52-34 (C) and the container is not dated as required in rule 3745-52-34 (A), less than 90 days accumulation area.

Ohio EPA concludes that RVAAP can manage the second area as a satellite accumulation drum if it meets the requirements of rule 3745-52-34 (C) (such as by locking the room used to accumulate the waste and restricting entry to the operators of the process). The second alternative is to manage these areas as less than 90 day accumulation areas by complying with the requirements of rule 3745-52-34 (A) of the OAC.

Please inform the agency of your decision and submit documents and pictures to demonstrate compliance.

4. RVAAP has requested a clarification on the issue of handling treated K044 ash by open burning process. Ohio EPA recently has made a rule on a similar issue with another facility that has a similar operation. The Ohio EPA has determined that

Mr. Thomas Chanda
January 14, 1991
Page -6-

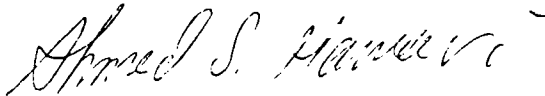
treated hazardous waste K044, which is listed due to exhibiting the characteristic of reactivity, can be considered solid waste. However, the facility must conduct tests such as reactivity and TCLP to confirm that the ash residue is no longer considered hazardous. Please find enclosed, in attachment, Ohio EPA correspondence concerning a similar issue with Austin Powder Disposal.

Please submit to my attention documents demonstrating RVAAP compliance with above violations within thirty (30) days of the receipt of this letter . In addition, please submit documents and/or responses to the concerns raised during the inspection.

Should you have a question, call our office at (216) 425-9171. Please note that as of January 28, 1991 my name will be changed to **AHMED S. HAWARI**.

Thank you for your cooperation and support.

Sincerely,



Ahmed S. Hawari (Ahmed A. Mustafa)
Environmental Geologist
Division of Solid and Hazardous Waste
Management

ASH/fn/dsk

cc: Harry Courtright, DSHWM, NEDO
Paul Anderson, DSHWM, NEDO
Laurie Stevenson, DSHWM, CO

February 28, 1991

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

TO: Ohio Environmental Protection Agency
Northeast District Office
ATTN: Ahmed S. Hawari
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

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Subject: Response to your letter of January 31, 1991 regarding
November 1990 inspection at RVAAP

Dear Mr. Hawari:

The following describes the actions taken at the Ravenna Army Ammunition Plant in response to violations and concerns noted during your November/December 1990 hazardous waste inspection of this facility.

VIOLATIONS NOTED AND ACTION TAKEN

1. Accumulation Time of Hazardous Waste OAC 3745-52-34(C)
 - I. Paint filters at PI are now accumulated in one 55 gallon drum which is properly labeled. The drum is kept inside building 1B-13 which is locked when the operator is not present. Attached is a photograph showing the accumulation area in 1B-13 (attachment #1) and a photograph of the present accumulation drum showing the proper labeling (attachment #2).
 - II. Waste paint and waste solvent are now being accumulated together in one 55 gallon drum. The drum is kept inside building 1B-22 which is locked at all times. The key is controlled by the operator of the process generating this waste. The quantity of waste accumulated in building 1B-22 will not exceed 55 gallons. Attached are photographs showing the accumulation drum in 1B-22 (attachment #3).

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AMS MC-ISE }
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III. Operators and supervisors at pouring areas on both lines have been re-instructed in the proper marking and labeling requirements for containers of hazardous waste. It should be noted that both boxes in question were labeled with the words "Hazardous Waste" on December 3, 1990.

2. Accumulation Date OAC 3745-52-34 (A)

As previously mentioned, waste paint and waste solvent at PI are now accumulated together in one 55 gallon drum. The quantity accumulated will not exceed 55 gallons.

3. Management of Containers OAC 3745-66-73(A)

Operators and Supervisors at pouring areas on both lines have been reinstructed on the requirement of closing hazardous waste containers when not actively in use.

4. Accumulation Greater Than 90 Days Without a Permit
OAC 3745-52-34(B)/Ohio Revised Code (ORC) 3734.02(F)

All hazardous waste stored at building X-232 for greater than 90 days have since been removed and treated by open burning. The waste stored in W-221 was found upon analysis by TCLP to be non-hazardous. Attached is a copy of the current inventory sheets for buildings X-232 and W-221 (Attachment #4).

5. Personnel Training OAC 3745-65-16(D) (2)

PI has amended their job descriptions to include the duty of handling hazardous wastes for those employees who are required to do so. The amended descriptions require corporate approval prior to implementation at PI. Attached is a copy of a draft amended job description (attachment #5).

6. General Inspection Requirements OAC 3745-65-15(B)(1) & (C)

A written inspection plan has been developed for RVAAP and is attached (attachment #6). A training session to familiarize affected employees with the plan was held on February 28, 1991. Attached you will find a list of attendees (attachment #7). The telephone near building 1601 has been repaired and is functioning.

7. Waste Analysis and Recordkeeping OAC 3745-59-07(A) (1) (b)

Appropriate treatment standards were mistakenly omitted from the LDR notification accompanying one shipment of restricted wastes to the treatment facility. All other shipments contained the treatment standard information. Future shipments of restricted wastes will be accompanied by a notification containing appropriate treatment standards.

CONCERNS

1. The drum with the bent lid contained non-hazardous ash residue. The ash has since been sent off-site for disposal.
2. Waste paint/solvent generated from the cleaning of the paint gun is collected in a satellite accumulation container which is labelled with the words "Hazardous Waste".
3. Both Load Line #6 and Load Line #7 now have satellite accumulation containers in locked rooms with entry restricted to the operator of the process. The satellite accumulation area in Load Line #6 is located in the Old Saw Bay in Building 2F-7; the area in Load Line #7 is located in the South Bay in Building 1B-4. Attached are photographs showing the accumulation areas in Load Line #6 (attachment #8) and #7 (attachment #9).

We trust the above information and attached documentation will return RVAAP to compliance with regard to issues raised during your November/December inspection. If you have questions or need further information, the Ravenna Arsenal, Inc. point of contact is Thomas M. Chanda at (216) 297-3221; the Government point of contact is Robert J. Kasper, Commander's Representative, at (216) 297-3124.

Sincerely,

RAVENNA ARSENAL, INC.

H.R. Cooper
H.R. Cooper

SMC/ade/91005

cc:

N. Wulff
T. Chanda
File

ATTACHMENT #1



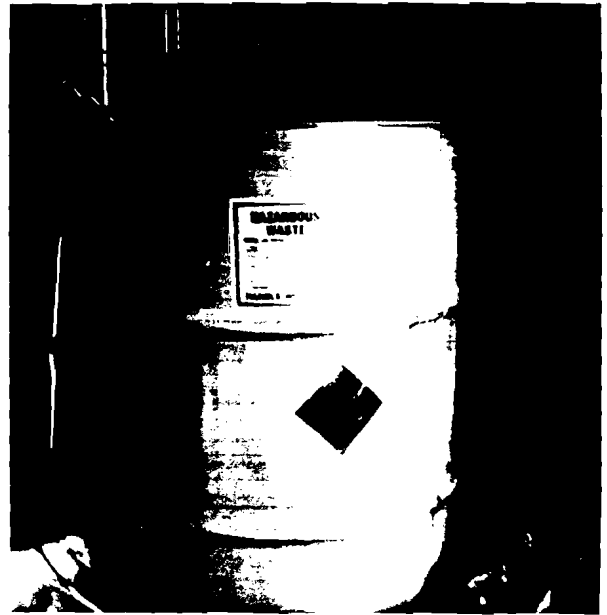
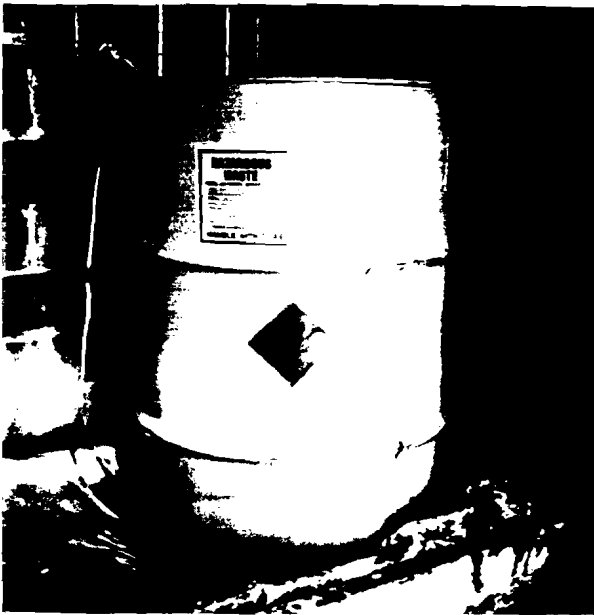
Accumulation Area, Bldg. 1B-13
Load Line 7

ATTACHMENT #2



Accumulation Drum - Spent Paint Filters
Bldg. 1B-13, Load Line 7

ATTACHMENT #3



Accumulation Drum - Waste Paint/Solvent
Bldg. 1B-22, Load Line 7

RAVENNA ARMY AMMUNITION PLANT
90 DAY HAZARDOUS WASTE STORAGE FACILITY

INVENTORY FOR BLDG. X-232

FEBRUARY 15, 1991

CONTAINER NO.	GROSS WT. (LBS.)	DATE STORED	HAZARDOUS MATERIAL	GENERATOR
XD17	195	11/29/90	OCTOL CONT. TRASH	LL7
XD18	111	1/10/91	EXPL. CONT. TRASH	LL6
XD19	140	1/31/91	OCTOL-CONTAMINATED TRASH	LL7
XB58	30	12/5/90	OCTOL DRILL DUST	LL7
XB59	44	12/5/90	OCTOL DRILL DUST	LL6
XB60	34	12/5/90	OCTOL DRILL DUST	LL6
XB61	55	12/12/90	OCTOL VACUUM DUST	LL6
XB62	60	12/12/90	OCTOL VACUUM DUST	LL6
XB63	49	12/12/90	OCTOL VACUUM DUST	LL7
XB64	48	12/20/90	OCTOL DRILL DUST	LL6
XB65	59	12/20/90	OCTOL DRILL DUST	LL7
XB66	43	1/10/91	OCTOL DRAIN SCRAP	LL7
XB67	48	1/10/91	OCTOL VACUUM DUST	LL7
XB68	40	1/10/91	COMP B VACUUM DUST	LL6
XB69	43	1/10/91	COMP B VACUUM DUST	LL6
XB70	43	1/17/91	COMP B DRILL DUST	LL6
XB71	60	1/17/91	OCTOL DRILL DUST	LL7
XB72	44	1/17/91	OCTOL DRAIN SCRAP	LL7
XB73	53	1/25/91	COMP B DRILL DUST	LL6
XB74	43	1/25/91	COMP B SUMP SCRAP	LL6
XB75	42	1/31/91	COMP B DRILL DUST	LL6
XB76	49	1/31/91	OCTOL DRILL DUST	LL7
XB77	48	1/31/91	OCTOL DRILL DUST	LL7
XB78	68	1/31/91	OCTOL DRILL DUST	LL7
XB79	41	1/31/91	OCTOL SUMP SCRAP	LL7
XB80	32	2/6/91	OCTOL DRILL DUST	LL7
XB81	37	2/6/91	OCTOL DRILL DUST	LL7
XB82	40	2/6/91	OCTOL DRAIN SCRAP	LL7
XB83	42	2/6/91	OCTOL DRILL DUST	LL7
XB84	40	2/14/91	COMP B DRILL DUST	LL6
XB85	58	2/14/91	COMP B DRILL DUST	LL6

ATTACHMENT #4

INVENTORY FOR BLDG. W-221

FEBRUARY 15, 1991

CONTAINER NO.	GROSS WT. (LBS.)	DATE STORED	HAZARDOUS MATERIAL	GENERATOR	DATE REMOVED FROM W-221	DESIGNATED ACTION UPON REMOVAL FM/W-221
WD114	93	8/27/90	NON/HAZ PAINT FILTERS	BLDG. 1036	1/30/91	ALB REFUSE/CHAIN OF CUSTODY
WD117	399	1/17/91	WASTE PAINT MIXTURE	LL7		
WD118	441	1/17/91	WASTE SOLVENT MIXTURE	LL7		
WD119	97	2/6/91	WASTE PAINT FILTERS	LL7		

PHYSICS INTERNATIONAL COMPANY

POSITION DESCRIPTION

DRAFT

JOB TITLE: Production Technician I

FLSA: Non-Exempt

SUMMARY:

Entry level position. Performs elementary routine duties in the field of explosives. Work is performed under close supervision. Assignments are of a limited nature. Incumbents follow detailed instructions, diagrams, schematics, manuals, etc.

POSITION ACTIVITIES:

- . Assemble metal parts
- . Cast explosive warheads
- . Assemble warhead end item components
- . Explosive handling with direct, close supervision
- . Handle hazardous material and hazardous waste

POSITION RESPONSIBILITIES

Follow supervisory instructions closely in doing daily assigned tasks.
Follow safety practices and procedures.

POSITION REQUIREMENTS

Education & Experience -

High school diploma or equivalent, plus explosive loading, assembly and packing experience desirable.

Skills and Abilities -

Ability to follow oral and written detailed instructions, diagrams, schematics, manuals and know when to ask for help.
Exposure to explosives under safe conditions.

Knowledge -

Safety practices and procedures. Basic test equipment. Basic hand tools.

FAMILY

Production Technician I
Production Technician II
Production Technician III

The description reflects in general terms the type and level(s) of work performed. It is not intended to be all-inclusive, nor portray the specific duties of any one incumbent.

ATTACHMENT #6

RAVENNA ARSENAL, INC.
RAVENNA ARMY AMMUNITION PLANT

STANDARD PRACTICE

SP NO. ME 4-9
EFFECTIVE
REVISED
REVIEW

SUBJECT: RCRA INSPECTION REQUIREMENTS FOR HAZARDOUS WASTE STORAGE
BUILDING 1601 AT THE RAVENNA ARMY AMMUNITION PLANT

PREPARED BY: ENVIRONMENTAL ENGINEERING

I. PURPOSE

Provide a written procedure that instructs Engineering personnel in properly inspecting Hazardous Waste Storage Building #1601.

II. POLICY

A. Basic Policy

1. Ravenna Arsenal, Inc. shall meet all applicable requirements of Rules 3745-55-70 to 3745-55-78 of the Ohio Administrative Code (OAC).
2. Assure administration of proper hazardous waste (HW) storage inspection procedures that are compliant with regulatory parameters.
3. Existing procedures and training which already reflect a high level of safety awareness will be used where appropriate.

B. Responsibility

1. Environmental Engineering (EE)
 - a. Provide written procedure to perform regulatory required inspection of containerized hazardous waste located at RVAAP's Bldg. 1601.
 - b. Assure that designated inspection personnel are trained on an annual basis with regard to the implementation of this inspection procedure.
 - c. Perform annual review of this procedure for compliance with regulatory guidelines and to ensure the protection of the environment and human health.
-

- SECRET
- d. Review completed weekly inspection forms as submitted by Field Engineering personnel. Review action will encompass completeness, accuracy, and response to any deficiencies.
 - e. Maintain up-to-date Inventory Listing of the containers/contents in storage in Bldg. 1601, and maintain a posted copy of the current inventory inside Bldg. 1601.
 - f. Perform, at a minimum a quarterly inspection of Bldg. 1601 under a facility site engineering review and inspection scenario.
 - g. Assure that assigned inspection personnel along with the respective departmental supervisor receives the required annual regulatory hazardous waste training.
2. Facilities Engineering Maintenance Manager and Maintenance of Utilities Supervisor
- a. Designate subject hazardous waste inspection personnel to be assigned from job classification W-86, Sewage Treatment Plant Operator and Maintenance of Utilities Supervisor.
 - b. Assure that hazardous waste inspection requirements are performed on a weekly basis without exception.
 - c. Assure that completed weekly inspection forms, in the format of Attachment "A", be turned into the office of the Utilities of Maintenance Supervisor during the same week that inspection is performed.
 - d. Review and remediate applicable inspection deficiencies as cited by assigned inspection personnel.
 - e. Develop and conduct safety training on a regular basis to ensure the general safety of designated inspection personnel.
 - f. Assure that assigned inspection personnel receive annual hazardous waste training and actively participate in the Employee Health Maintenance Program.

- DRAFT
- g. Notify the Environmental Engineering Office of any inspection personnel changes prior to personnel assignment.
 - h. Periodically review and provide improvements to this procedure where applicable.

3. Assigned Inspection Personnel

- a. Read and fully comprehend this procedure at least annually and document that action via a prepared sign-off sheet.
- b. Perform the required inspection of the Hazardous Waste Storage Building 1601 according to the parameters set forth within Section III. PROCEDURES of this Standard Practice.
- c. Periodically review and provide improvements to this procedures where applicable.
- d. Be aware that annual hazardous waste training is required in order to perform the inspection of Building 1601. No other personnel will be permitted to perform subject inspection without applicable training.
- e. Assure that weekly inspection forms, Attachment A, are completed in their entirety and submitted promptly.
- f. Inspections will be conducted in a manner that assures protection of the environment as well as human health.

III. PROCEDURES

A. General

- 1. Only dry ash residues from Open Burning (OB) operations and contaminated activated carbon shall be stored in Building 1601. No liquids or other solid wastes not resulting from OB operation will be permitted storage in this building.
 - 2. Inspection of hazardous waste storage Building 1601 will be conducted on a strict weekly basis. No exceptions will be made for holidays or for unavailability of inspection personnel. The Environmental Engineering Office will undertake the inspection requirements during absences of regular inspection personnel.
-

3. All sections of the hazardous waste inspection form (Attachment A) with exception of Section J (Comments) and K (Repairs/Remedial Action R/RA) have to be completed for each weekly inspection.
4. Each portion of the inspection process will be identified by the inspector with a check-off as to one of three conditions; "Satisfactory", "Unsatisfactory", or "Not Acceptable". One of the three conditions shall be decided based upon the following conditions:
 - a. "Satisfactory" means a good and acceptable condition without any impact to the HW storage operations which would violate EPA regulations or create stress to the environment or human health.
 - b. "Unsatisfactory" means a deteriorating or unfavorable condition that has a good potential for violating EPA regulations or standards, but does not yet create stress to the environment or human health. If an area of the inspection is determined to be "Unsatisfactory" then it should be further referenced within the adjacent column titled "Comment NUMBER". All "Unsatisfactory" citations will be given a sequential reference number under the "Comment Number"; for example the first "Unsatisfactory" mark will be further identified under the "Comment Number" column with an identifier of "UNS-1"; second "Unsatisfactory" entry would be identified by "UNS-2" on the appropriate line under the "Comment Number" column, this sequence would continue for any other "Unsatisfactory" citations. The inspection will then go to Section J. of the inspection form (Titled COMMENTS) and enter the respective "UNS-X" identifier followed by a short description of why an "Unsatisfactory" mark was entered.
 - c. "Not Acceptable" means a situation that is present which poses a violation to EPA regulations or standards, or a situation which creates stress to the environment or human health. If an area of the inspection is determined to be "Not Acceptable" then it should be further referenced within the adjacent column titled "Comment Number". All "Not Acceptable" citations will be given a sequential reference number under "Comment Number"; for example the first "Not Acceptable"

0011

mark will be further identified on the "Comment Number column with an identifier of "NAC-X".

4. Following completion of Inspection and the inspection form (Attachment A) the form will be turned into the Maintenance of Utilities Supervisor's Office.
 5. Upon receipt, the M.O.U. Supervisor will review the completed inspection report with the appropriate inspector. Special attention will be given to Section J, Comments. If any "Unsatisfactory" or "Not Acceptable" comments have been provided in Section J. then an appropriate action or explanation will be provided in Section K. Section K. will describe what remedial action was undertaken to restore conditions to "Satisfactory".
 6. The inspection form will be forwarded to the Environmental Engineering (EE) Office following the completion of Section K. The EE Office will review and monitor any remedial actions that must be implemented.
- B. Site Inspections Specifics - Completing the Inspection Form
1. Section A - Vehicular Access
 - a. Items A.1. and A.2. requires inspector to evaluate structural integrity and security of the access route from George Road to Building 1601. Can the road and the entrance to Bldg. 1601 support light and heavy vehicle traffic?
 - b. Attention should be given to ruts, soft spots, and berms.
 - c. The chain gate at the entrance of Road "B" West should be up prior to entering and following exit from the Road "B" west.
 2. Section B - Building 1601 (Exterior)
 - a. Items B.1. through B.7. addresses the security of Building 1601 from unauthorized access, provision of ample warning to personnel entering onto the site; integrity of the visible portions of building structure; and the general site conditions.
 - b. The security inspection should assure that all locking devices are in place and functional and that no unauthorized entry has been

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attempted.

- c. Inspect Building 1601's exterior for structural integrity, including wingwalls, overhead doors, entrance ways, and soil cover overtop roof portion of building.
 - d. Assure warning signs on the front of Building 1601 are securely fixed and legible.
 - e. General site conditions around the building should demonstrate good housekeeping practices. This includes effective weed control and no presence of trash/debris (e.g. pallets, dunnage, banding, rags, and/or paper).
3. Section C Building 1601 (Interior)
- a. This portion of the inspection should address the structural integrity of floors, walls, and ceiling; adequate aisle space around the rows of containers; visible signs that any leak or spill has occurred; and the overall housekeeping practices maintained within the building.
 - b. The interior's structural integrity should assure that no wall, floor, or ceiling cracks are present. Concrete surfaces should be dry and intact with no evidence of spaulding.
 - c. Adequate aisle space should be available between the rows or containers as well as between rows and interior walls. Adequate aisle space shall be determined as having an easy and uninhibited pathway around and through the rows of stored containers of hazardous waste.
 - d. The entire floor area shall be thoroughly inspected to assure no occurrence of a spill or a leak. This inspection should include the space between and under the hazardous waste containers.
 - e. Assure that good housekeeping practices are being maintained with regards to the presence of debris/trash and that floors are swept. This should also include checking to ensure that the building's current inventory and a copy of this standard practice are both posted and visible.

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4. Waste Drums

- a. This inspection directs itself to the integrity, labelling, and overall storage status of the hazardous waste containers.
- b. Each drum's entire accessible exterior surface should be physically checked by light rapping with a blunt wooden object. This will include checking the conditions of the drums exterior painted surface. Any serious structural defects will require immediate replacement. Light rust should be taken care of promptly with wire brushing and recoating of damaged surface with a protective paint that's designed for applying on metal surfaces.
- c. All drums should be labelled. Required labelling should include the words "HAZARDOUS WASTE"; the origin (material) from which the ash or carbon was generated; and the date when the drum first began to receive hazardous waste. All drums will be assigned a sequential inventory number according to the next opening on the inventory listing. All drum labelling and numbering will be readily visible upon inspection. Labelling and numbering will be located on the side of the drum facing the north-south aisle way.
- d. Drums will be stored in an upright position, on pallets and secured by banding. Lid ring fasteners will be secured with bolts in a secure position.

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5. Section E. Spill Control Equipment

- a. Inspection E1 through E9 items shall be conducted in a manner that determines readiness of listed equipment.
- b. Interview the Roads & Grounds Maintenance Supervisor to determine the operating condition of his equipment. A random inspection should be performed on at least two pieces of operating equipment.
- c. Any equipment down for repairs should be identified for what period of time it will be inoperable; or its expected date of returning to service.
- d. The Bldg. 1067 Spill Response Room will be inspected during the course of completing this inspection form.

6. Section F. Personnel Protection Equipment (PPE)

- a. Inspection of F1 through F5 items is conducted on the appropriate PPE stored at Bldg. 1067 Spill Room and Bldg. 1035 General Stores Area.

- 11
7. Section G. Condition of Applicable Fire Extinguishers
 - a. Any vehicle and/or Building 1601 fire extinguisher will be inspected to assure the unit is charged and has been physically inspected by Fire Department personnel.
 - b. The inspector will review the vehicle fire extinguisher's inspection tag to assure that at minimum of once every four months the unit has been physically inspected by Fire Dept. personnel. If there's no evidence of this quarterly inspection it will require that the inspector make the extinguisher available to Fire Department inspection personnel.
 8. Section H. Condition Vehicle Communication System
 - a. A portable/vehicle radio check with the AAC545 radio dispatcher conducted on each inspection tour.
 - b. Periodically, the inspector will review the dispatcher's radio log to assure that the radio checks have been entered as a matter of record.
 9. Section I. Condition of Nearest Telephone
 - a. The designated phone is located at the corner (Northwest direction) of Lane "D" West Road & George Road intersection.
 - b. The inspectors will make telephone contact with the on-duty AAC545 radio dispatcher. Time of contact will be recorded on the inspection form Attachment "A".
 10. Section J. Comments
 - a. The inspector using the appropriate "Comment Number" will describe "Unsatisfactory" (UNS) and "NOT ACCEPTABLE" (NAC) sitings annotated on the inspection form's checklist.
 - b. Further explanation for this part is provided in Section III A. 4(a); 4(b); 4(C); 5, 6, & .7

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- c. All "UNSATISFACTORY" or "NOT ACCEPTABLE" comments will continually be referenced in the next week's inspection report until the situation returns to "SATISFACTORY".

11. Section K. Repairs/Remedial Action (R/RA)

- a. All "UNSATISFACTORY" or "NOT ACCEPTABLE" remedial actions will be addressed in this section.
- b. This section of the inspection form will be completed by the Maintenance of Utilities (MOU) Supervisor.
- c. The "DATE" portion of this section requires that the date be entered regarding when an "UNSATISFACTORY" or "NOT ACCEPTABLE" condition has been returned to "SATISFACTORY" status. The area of question should be adequately described as to the "what" and/or "where" of the deficiency.
- d. The "Description of R/RA" portion of this section should describe what will be done; what is being done; when will it be done, and how was it done.

12. Filing of the Completed Inspection Form

- a. After the inspection form has been completed by both the assigned inspection personnel and the MOU Supervisor, it will be forwarded onto the Environmental Engineering (EE) Office.
- b. The inspection form turn-in to the EE Office will transpire no later than the Monday following that inspection week.
- c. The EE Office will review the completed inspection form, record any Section J. comments identified with "UNS-X" or "NAC-X" nomenclature, and track the sited deficiencies until the situation results in a "SATISFACTORY" condition.

STANDARD PRACTICE ME-4-9

ATTACHMENT A

1055 . . .

**RAVENNA ARMY AMMUNITION PLANT
HW INSPECTION PLAN**

Date: _____

Inspected By: _____

Weather Conditions: _____

Time: Started _____ (a.m./p.m.) Completed _____ (a.m./p.m.)

S A T I S F A C T O R Y	U N S A T I S F A C T O R Y	N O T A C C E P T A B L E	C O M M E N T
--	--	---	---------------------------------

A. Vehicular Access (Weekly)

- | | | | | |
|---|---|---|---|---|
| 1. Road "B" West from George Road | — | — | — | — |
| 2. Access drive of Building 1601 from Road "B" West | — | — | — | — |

B. Building 1601 (Exterior) (Weekly)

- | | | | | |
|---|---|---|---|---|
| 1. Security of Doors | — | — | — | — |
| 2. Security of Locks | — | — | — | — |
| 3. Security of Warning and No Smoking Signs | — | — | — | — |
| 4. Evidence of Tampering | — | — | — | — |
| 5. Evidence of Damage | — | — | — | — |
| 6. Evidence of Loose Trash/Debris | — | — | — | — |
| 7. Condition of Soil Cover | — | — | — | — |

	S A T I S F A C T O R Y	U N S A T I S F A C T O R Y	N O T A C C E P T A B L E	C O M M E N T
C. Building 1601 (Interior) (Weekly)				
1. General Concrete Integrity	—	—	—	—
2. Floor Integrity	—	—	—	—
3. Ceiling Integrity	—	—	—	—
4. Check Aisle Space	—	—	—	—
5. Evidence of General Spills/Leaks	—	—	—	—
6. Evidence of Loose Trash/Debris	—	—	—	—
D. Waste Drums (Weekly)				
1. Drums on Pallet	—	—	—	—
2. Drums Are Equipped with Lids and Locking Devices	—	—	—	—
3. Drums Are Labeled Properly	—	—	—	—
4. Evidence of Leaking Drum(s)	—	—	—	—
5. Evidence of Tampering of Drums(s)	—	—	—	—
6. Evidence of Damage to Drum(s)	—	—	—	—
7. Evidence of Odor From Drum(s)	—	—	—	—
E. Spill Control Equipment (Monthly)				
1. Condition of Backhoe(s)	—	—	—	—
2. Condition of Bulldozer(s)	—	—	—	—

TABLE 1. (Continued)

	S A T I S F A C T O R Y	U N S A T I S F A C T O R Y	N O T A C C E P T A B L E	C O M M E N T
E. Spill Control Equipment (Weekly) (Continued)				
3. Condition of Mobile Crane	—	—	—	—
4. Condition of Crawler Crane	—	—	—	—
5. Condition of Road Grader(s)	—	—	—	—
6. Condition of Grade-All Ditcher	—	—	—	—
7. Condition of Dump Truck(s)	—	—	—	—
8. Condition of Ditch Pump(s)	—	—	—	—
9. Condition of Sludge Pump	—	—	—	—
F. Personnel Protection Equipment (Monthly)				
1. Condition of Eye Protection Devices	—	—	—	—
2. Condition of Emergency Coveralls	—	—	—	—
3. Condition of Protective Footwear	—	—	—	—
4. Condition of Gloves	—	—	—	—
5. Condition of Dust Mask Type Respirator	—	—	—	—
G. Condition of Applicable Fire Extinguishers	—	—	—	—
H. Condition of Vehicle Communication System	—	—	—	—
I. Condition of Nearest Telephone	—	—	—	—

TABLE F-1 (Continued)

J. Comments: _____

K. Repairs/Remedial Action (R/RA):

Date: _____

Description of R/RA: _____

APPROVAL:

H. R. COOPER, PLANT ENGINEER

DATE

J. D. MCGEE, MGR., MAINT. & INSTALLATION

DATE

T. M. CHANDA, ENVIRONMENTAL ENGINEER

DATE

APPROVAL OF REVISION OF:

H. R. COOPER, PLANT ENGINEER

DATE

J. D. MCGEE, MGR., MAINT. & INSTALLATION

DATE

T. M. CHANDA, ENVIRONMENTAL ENGINEER

DATE

CERTIFICATION STATEMENT
FOR
UNDERSTANDING AND REVIEW OF STANDARD PRACTICE ME-4-9
FOR PURPOSES OF PERFORMING JOB RESPONSIBILITIES
IN THE
WEEKLY INSPECTION OF HAZARDOUS WASTE STORAGE BUILDING 1601
LOCATED AT THE RAVENNA ARMY AMMUNITION PLANT

CERTIFICATION STATEMENT:

I have read and had explained to me the inspection procedures as they pertain to Standard Practice ME-4-9. The procedures as prescribed within the Standard Practice ME-4-9 describe the applicable method to which an inspection will be conducted upon Ravenna Army Ammunition Plant's Hazardous Waste Storage Building 1601. Following my review and the instruction given to me I fully understand my responsibilities as they apply to the inspection requirements of the Hazardous Waste Storage Building 1601.

SIGNATURES:

1. Printed Name: LAWRENCE W JOHNSON
Signature: Lawrence W Johnson
Date: 2/28/91
2. Printed Name: LOUIS F. BEDNAR
Signature: Louis F. Bednar
Date: 2/28/91
3. Printed Name: JOE MOUND
Signature: Joseph W. Mound
Date: 2-23-91

EXPLANATION AND INSTRUCTION PROVIDED BY:

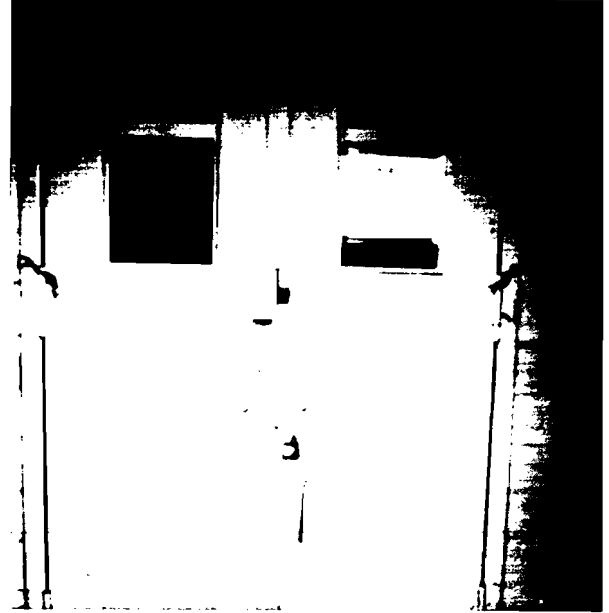
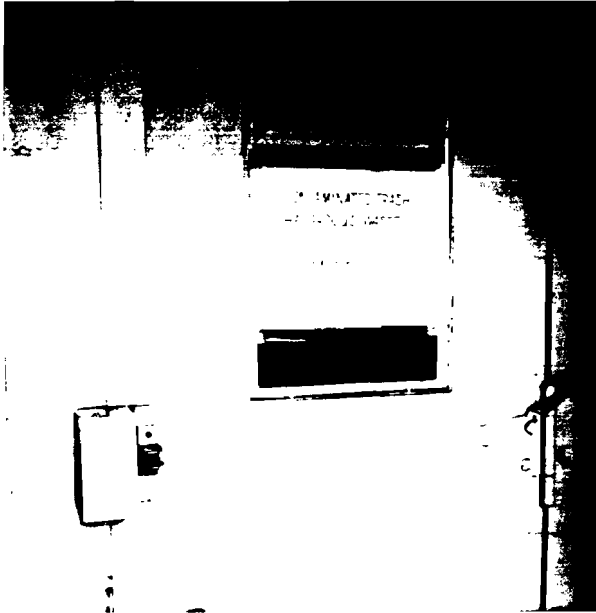
Printed Name: Thomas M. Chanda Title: Environmental Engineer
Signature: Thomas M. Chanda
Date: 2/28/91

ATTACHMENT #8



Satellite Accumulation Area for Contaminated Trash
Bldg. 2F-7, Load Line 6

ATTACHMENT #9



Satellite Accumulation Area for Contaminated Trash
Bldg. 1B-4, Load Line 7



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

29,000
Permit 7

CR-COR	
CONT ADM	
PROP ADM	
QASAS	
SECURITY	
RAI	2/4/91
RETURN FOR FILE	

George V. Voinovich
Governor

February 1, 1991

Mr. David R. Kubala, Manager LAP
Physics International Company
Olin Defense Systems Group
Ravenna Army Ammunition Plant
Ravenna, OH 44266

Dear Mr. Kubala:

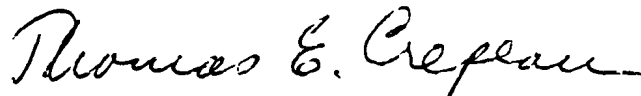
This letter is in response to your September 10, 1990 letter regarding the 1990 hazardous waste annual permit fee for Physics International (copy attached). Physics International was issued a permit by the Ohio Hazardous Waste Facility Board (HWFB) on September 24, 1981. We have searched our files and have been unable to locate any correspondence relating to withdrawal of Physics International's permit. Therefore, at your request, I am initiating procedures to withdraw Physics International's HWFB permit for the horseshoe-shaped open burn area. Physics International is hereby required to submit 3 copies of the closure plan for this area to the Director of Ohio EPA at the letterhead address within 30 days of the date of this letter. Physics International is not required to pay the \$1,000 1990 annual fee, unless the company does not submit a closure plan by March 4, 1991 or decides not to withdraw its permit.

I acknowledge U.S. EPA's letter of November 28, 1986 (copy attached), which you also sent. Unfortunately, Physics International's Part A status is not the same with both U.S. EPA and Ohio EPA. Although Ravenna Arsenal/Physics International has interim status with U.S. EPA, only Physics International has interim status (i.e., a HWFB permit) with Ohio EPA. Ohio EPA has not, to date, combined Ravenna Arsenal and Physics International into one facility for permitting purposes. Ohio EPA has not received a copy of either the combined Part A or Part B application for Ravenna Arsenal and Physics International, as required by the November 28, 1986 letter. If Ravenna Arsenal now owns or operates the HWFB-permitted open burn area, a revised RCRA Part A application (permit change request) must be submitted by March 4, 1991 to show that there has been an owner/operator change. Under this scenario, Ravenna Arsenal would be required to pay the \$1,000 1990 fee and future annual permit fees.

Mr. David R. Kubala
February 1, 1991
Page Two

I may be contacted at (614) 644-2977 if you have further questions.

Very truly yours,



Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

Attachments

cc (with Attachments): Paul Cross, Physics International Company
Robert Kasper, Ravenna Army Ammunition
Plant
Thomas Chanda, Ravenna Arsenal, Inc.
Ed Kitchen, DSHWM
Ed Lim, DSHWM
Randy Sheldon, DSHWM
Vicki Galilei, Fiscal Administration
Ahmed Mustafa, NEDO
Paul Anderson, NEDO

09.00
1.50

RAVENNA ARSENAL, INC.
TELEPHONE CONVERSATION RECORD
February 15, 1991

PERSON CALLING: Allen Harness - Ohio EPA Solid & Haz. Waste
Division, Columbus, Ohio **PHONE:** 644-2975

PERSON CALLED: Tom Chanda - RAI Environmental Engineer
PHONE: 297-3221

SUBJECT: OHEPA Meeting With Physics International (PI) Company
Representatives to Clarify 1 February 1991 OHEPA Letter;
RE: PI's Abandoned OHEPA RCRA Permit

NOTICE OF MEETING

DATE: March 7, 1991
TIME: 11:00 a.m. (Note to Addressees: This is a new time;
previous time was 10:15 a.m.)
PLACE: Ohio EPA Headquarters, Columbus, Ohio

PLANNED ATTENDEES

OHIO EPA

Allen Harness, Engineer F/Tech. Review Section
Ed Lim, Supervisor F/Tech. Review Section
Mark Navar, Legal Counsel
Rhonda Rothchild, Data Management

OLIN/PHYSICS INTERNATIONAL COMPANY

Paul Cross, PI, RVAAP, Load Line #7 Operations
Doug Mumma, PI, San Leandro
Tom Wisely, Olin Ordnance Environmental
George Pain, Olin Legal
Tom Chanda, RAI, Environmental Engineer
Harold Cooper, RAI, Plant Engineer

2/19/91

TO	
COR-COR	
CONT ADM	
PROP ADM	
ASAS	
SECURITY	
FILE	
RETURN FOR FILE	

The February 1, 1991 Ohio EPA letter required Physics International Company to provide a formal response no later than March 4, 1991. Since the meeting date falls after the regulator's 4 March 1991 response date, Paul Cross will prepare and forward a 30 day extension request letter to Ohio EPA's Thomas E. Crepeau, Data Management Manager for the Solid & Hazardous Waste Division.

Tom Chanda
Tom Chanda

TMC/ade
cc: COR
N. Wulff
H. Cooper
G. Pain, East Alton (via Data Fax)
T. Wisely, St. Petersburg (via Data Fax)
P. Cross/D. Mumma
File

*Harry Cross
Amshouse-E
dated
2/19/90*

21 February 91

SUBJECT: EPA Meeting 7 Mar 91, RCRA Permit PI

Reference:

1. OHEPA ltr dated 1 Feb 91.
2. PI ltr dated 15 Feb 91.
3. RAI ltr dated 20 Feb 91.

I Called Allen Harness OHEPA 614-644-2975 on 19 Feb 91, to discuss their letter dated 12 Feb 91.

We reviewed the relationship of PI, Olin and RAI to RVAAP. Mr. Harness advised me that PI probably could, as a tenant on RVAAP, maintain their interim status under OH4 210 090 003 with OHEPA.

The U.S. Army as the owner of RVAAP, does not desire to maintain the cited OD area as a permitted hazardous waste site. We have identified this area as a SWMU and it is included in Part B as a matter of record.

We discussed the Region 5 CAFO and how PI has complied with the CAFO. He was interested in having PI contact him as they may be able to clarify the requirements of the 1 Feb ltr. by using the data submitted to Region 5. Mr. Harness was confident this issue could be resolved by telephone in lieu of having six (6) people come to OHEPA. I advised him that I would encourage the contractor to contact him by phone ASAP.

Info was given to Chanda this date. He will talk over problem with parties involved.

Also, called Dr. Crain AMCCOM 793-1434 to review above. Datafaxed the refer ltrs to him this date. He will check with John Rock legal and let me know what position if any the Army takes in this. Previous guidance was that RAI and RVAAP are not involved in this matter.

ROBERT J. KASPER
Commander's Representative

AGENDA

MARCH 7, 1991
11:00AM
CONFERENCE ROOM 4B

The objective of this meeting will be to discuss:

1. The Relationship between Olin, Ravenna Arsenal and Physics International.
2. The Disposition of Physics International's HWEB Permit.
3. The Proposed Exemption Order to be issued to Ravenna Army Ammunition Plant

FACTS

- Ravenna Army Ammunition Plant has obtained Federal interim status with the U.S. EPA.
- Physics International currently operates under a revised Ohio Hazardous Waste Facility Board Installation and Operation Permit (February 18, 1986).

Attendance Sheet

March 7 1991

Name

Affiliation

Alan Horrocks

Ohio EPA (614) 241-2914

Thomas Chanda

Ravenna Arsenal Inc.

PAUL CROSS

Physics International

Harold Cooper

Ravenna Arsenal, Inc.

Tom Wisely

Olin - St. Petersburg

Rhonda Rothschild

Ohio EPA

MARK NAVARRE

Ohio EPA, legal section

ED LIM

OEPA, ENGINEERING SECTION

Edward Kitchen

OEPA, RCRA Tech. Asst. Section

GEORGE PAIN

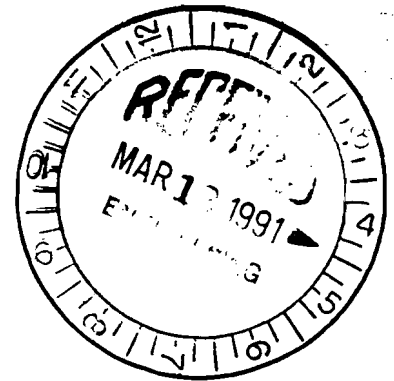
OLIN - (618) 258-341

(Speakerphone) Ahmed Hawari

Ohio EPA Twinsburg



EAST ALTON, IL 62024-1174



GEORGE H. PAIN
Senior Counsel
Phone: 618-258-3411
Fax: 618-258-2732

RECEIVED
MAR 18 1991
N. WULFF

March 11, 1991

Mr. Ed Lim
Ohio EPA Headquarters
1800 Watermark Drive
Columbus, OH 43201

TO	3/11/91
CR-COR	
CONT ADM	
PROP ADM	
PLAS	
SECURITY	
RAI	
RETURN FOR FILE	

TO	OFFICE	ACTION
C	GM	
C	CO-COR	
	ACCTG	
	SEC	
C	ENGR	
	IR	
	S & T & O	
	P & C A	
	SAF	
	DPM	
	RETURN	

RE: RVAAP Facility, Ravenna, Ohio RCRA Permit

Dear Mr. Lim:

The purpose of this letter is to memorialize our discussions during the meeting held at OEPA headquarters in Columbus, Ohio on March 7, 1991 on the above-referenced matter.

After discussing the corporate inter-relationships of Olin Corporation, Physics International Company (PI), and Ravenna Arsenal, Inc. (RAI), and also discussing the RCRA permitting history of both PI and RAI at RVAAP, we agreed on the following course of action:

1. PI will withdraw its State RCRA Permit Application for the open burn area and pinkwater tank, which is currently being certified as closed by OEPA.
2. The open burn area will be addressed as contemplated in the CAFO, which was executed by PI, RAI, and USEPA in consultation with the OEPA and the U.S. Army. A copy of the CAFO is attached for your reference. The soil sampling data that were generated pursuant to the CAFO have been submitted by RAI and the Army for incorporation into their RCRA Part B Permit Application currently being reviewed by USEPA and OEPA. The small open burn area is located within the same geographical area as the larger open detonation area. Accordingly, closure activities and corrective actions, if any, that may be required for the open burn area will be done in conjunction with, and at the same time as, closure activities and corrective actions that may be necessary for the larger open detonation area.

3. We understand that OEPA prefers to deal with the open burn area as an "active" RCRA unit within the larger open detonation unit, instead of treating it as an inactive solid waste management unit (SWMU). Accordingly, OEPA will review the RCRA Part B Permit Application to ensure that the information submitted by RAI and the Army is consistent with that approach. If you believe that additional information or clarification in the permit application is required, you will issue an NOD in the normal course of your review to address any ambiguities.

If my understanding of what transpired at the meeting is different from your understanding to any material degree, please contact me so that we can discuss the matter.

Thank you again for your time and attention, and I trust that this will resolve the regulatory confusion that existed at the RVAAP facility with respect to the RCRA permits.

Very truly yours,

A handwritten signature in cursive script that reads "George H. Pain". The signature is written in dark ink and is positioned above the printed name.

George H. Pain

cc: T. Chanda
H. R. Cooper
P. Cross
A. Harness, OEPA
G. T. Wisely

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

IN THE MATTER OF:)	DOCKET NO. V-W-88-R-028
)	
RAVENNA ARSENAL, INC. AND)	CONSENT AGREEMENT AND
PHYSICS INTERNATIONAL COMPANY)	FINAL ORDER
U.S. ARMY RAVENNA ARMY)	
AMMUNITION PLANT)	
RAVENNA, OHIO 44266-9297)	
)	
EPA I.D. NO. OH5 210 020 736)	

PREAMBLE

On June 29, 1988, a Complaint and Compliance Order was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondents are Ravenna Arsenal, Inc., and Physics International Company, 8451 State Route 5, Ravenna, Ohio 44266-9267.

STIPULATIONS

The parties to this action desiring to settle this action, and believing that this settlement is in the public interest, stipulate to the following solely for the purposes of this Consent Agreement and Final Order:

1. Respondents have been served with a copy of the Complaint, Findings of Violation, Compliance Order, and Notice of Opportunity for Hearing in this matter;

2. Respondents are contractors at the facility at the United States Army's Ravenna Army Ammunition Plant, 8451 State Route 5, Ravenna, Ohio 44266-9267. Ravenna Arsenal, Inc., is an Ohio corporation and Physics International Company is a California corporation. The Respondents' registered agent is C.T. Corporation System, 815 Superior Avenue, N.E., Cleveland, Ohio 44114;
 3. Respondents admit the jurisdictional allegations contained in the Complaint filed herein. Respondents admit that U.S. EPA has jurisdiction to enter and enforce the provisions of this Consent Agreement and Final Order (CAFO);
 4. Respondents neither admit nor deny the specific factual allegations contained in the Complaint;
 5. Respondents explicitly waive their right to request a hearing on the allegations contained in the Complaint filed herein;
 6. Respondents consent to the issuance of the Final Order hereinafter recited and hereby consent to the payment of a civil penalty in the amount hereinafter stipulated. The penalty is to be paid within sixty (60) days of the effective date of this Order;
 7. Respondents certify that to the best of their knowledge they have gathered all information in their possession which relates to the volume and type of materials open burned in the horseshoe shaped burn area within Demolition Area #2 and the hazardous waste, hazardous constituents and/or hazardous substances associated with these materials and will provide this information to U.S. EPA within
-

twenty (20) days of the effective date of this Order. Respondents certify to the best of their knowledge that only TNT, HMX, and RDX contaminated wastes from Load Line 6 were burned in the burn area on the soil surface;

8. From July 15, 1983, until January 31, 1986, the State of Ohio had Phase I interim authorization pursuant to Section 3006 of RCRA, 42 U.S.C. §6926, to administer a hazardous waste program in lieu of the Federal program. This authorization allowed either the State or U.S. EPA to enforce Ohio hazardous waste statutes and regulations, where applicable, in lieu of Federal statutes. U.S. EPA retained authority in matters related to the issuance of final RCRA Permits during this period. On January 31, 1986, the State of Ohio's authorization to carry out its hazardous waste program in lieu of the Federal program expired. On June 30, 1989, the State of Ohio was granted Final Authorization by the Administrator of U.S. EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 54 Federal Register 27170 (1989). As a result, facilities in Ohio qualifying for interim status under Section 3005(e) of RCRA, 42 U.S.C. §6925(e), are now regulated under the Ohio provisions found at Ohio Administrative Code (OAC) Rule 3745-50 et seq., rather than the Federal regulations set forth at 40 CFR Part 265. Section 3008(a) of RCRA, 42 U.S.C. §6928(a), provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program; and

9. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

FINAL ORDER

Based upon the foregoing stipulations, the Parties agree to the entry of the following Final Order:

A. Respondents shall immediately, upon the effective date of this Order, cease all treatment, storage, or disposal of any hazardous waste unless such treatment, storage, or disposal is conducted in compliance with OAC Rules 3745-52-10, 3745-65-01 and 3745-50-40 (40 CFR Parts 262, 265, and 270), except as provided below.

B. The Respondents shall submit a sampling and analysis plan and schedule for evaluating surface soil within the horseshoe-shaped burn area and adjacent surface soil in Demolition Area #2. This plan and schedule shall be submitted to U.S. EPA for approval within thirty (30) days of the effective date of this Final Order. The soil shall be analyzed in accordance with U.S. EPA approved sampling and analytical procedures including, but not limited to, U.S. EPA Methods for Evaluating Solid Wastes, SW-846. Samples shall be analyzed for EP Toxicity, TNT, HMX, and RDX in a phased approach. Five (5) soil samples shall be analyzed from the burn area for TNT, HMX, RDX, and for the characteristics of EP Toxicity for arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. If EP Toxicity, TNT, HMX, or RDX is detected in any of these five samples, phase two analysis shall be conducted for the detected substance or substances on ten (10) soil samples in the adjacent portion of Demolition Area #2.

C. The sampling and analysis plan shall be subject to review, modification, and approval by U.S. EPA in consultation with the Ohio Environmental Protection Agency (OEPA).

D. The Respondents shall implement the sampling and analysis plan upon approval by the U.S. EPA in accordance with the approved schedule.

E. Within 90 days of the approval of the sampling plan, the Respondents shall submit all analytical results and a summary report for the soil sampling to U.S. EPA and OEPA.

F. Within 120 days from the approval of the sampling plan, the Respondents shall submit all soil sample analytical results and summary report to U.S. EPA and the Ohio Environmental Protection Agency as an amendment to the facility's Part B hazardous waste permit application in accordance with requirements of OAC Rule 3745-50-44 (40 CFR 270.14(d)(3)).

G. Respondents shall continue the implementation of the pinkwater treatment tank closure plan as approved by U.S. EPA and OEPA on May 16, 1988, and subsequently amended and approved by OEPA.

H. Respondents shall notify U.S. EPA in writing upon achieving compliance with this Order or any part thereof. This notification shall accompany the sampling analytical results and summary reports required by this Order and this notification shall be submitted within fifteen (15) days of closure of the pinkwater treatment tank. This notification(s) of compliance shall be attested to by a responsible official who shall state:

"I certify that the information contained in or accompanying this notification of compliance is true, accurate, and complete."

This notification shall be submitted to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Catherine McCord, RCRA Enforcement Branch, 5HR-12.

I. Copies of sampling analytical results, summary reports, and all notifications of compliance shall also be submitted to the RCRA Permitting Branch, 5HR-13, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604; the Ohio Environmental Protection Agency, Northeast District Office, Division of Solid and Hazardous Waste Management, 2110 East Aurora Road, Twinsburg, Ohio 44087-1969; and the Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, 1800 WaterMark Drive, P.O. Box 2198, Columbus, Ohio 43266-2198, Attention: Enforcement Chief.

J. Respondents shall, within sixty (60) days of the effective date of this Order, pay a civil penalty in the amount of NINETEEN THOUSAND DOLLARS (\$19,000) payable to the Treasurer of the United States of America and mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673.

Copies of the transmittal of payment shall be mailed to the Regional Hearing Clerk, Planning and Management Division (5MF-14) and to the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), 230 South Dearborn Street, Chicago, Illinois 60604.

Interest shall accrue on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment charge of \$20.00 will be imposed after sixty (60) days, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid

within ninety days of the date that this Final Order is signed by the Regional Administrator.

Failure to comply with any requirement of this Final Order may subject Respondents to liability for penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued non-compliance with the terms of the Consent Agreement and Final Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

This Final Order constitutes a settlement and final disposition of the Complaint filed in this case and stipulations hereinbefore recited.

Notwithstanding any other provisions of this Final Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory provisions should U.S. EPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of the Ohio Administrative Code; 40 CFR Parts 124 and 270; and this Final Order.

SIGNATORIES

Each undersigned representative of a signatory to this Consent Agreement and Final Order consisting of 8 pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such signatory to this document.

Agreed this _____ day of _____, 1989

By _____
Ravenna Arsenal, Inc., Respondent

Title Vice President, Director of Administration

By *[Signature]*
Physics International Company, Respondent

Title _____

Agreed this 10th day of October, 1989

By _____
Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being considered to, it is so ordered

this _____ day of _____, 1989

By _____
Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

Docket No: V-W-88-R-028
Ravenna Arsenal Inc. and
Physics International
Company
U.S. Army Ravenna Army
Ammunition Plant

SIGNATORIES

Each undersigned representative of a signatory to this Consent Agreement and Final Order consisting of 8 pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such signatory to this document.

Agreed this 10th day of October, 1989

By *N. Wolff*
Ravenna Arsenal Inc., Respondent

Title *V.P. and General Manager*

By _____
Physics International Company, Respondent

Title _____

Agreed this 31st day of October, 1989

By *Basil G. Constantelos*
Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being considered to, it is so ordered
this 31st day of October, 1989

By *Robert Springer for*
Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

Docket No: V-W-88-R-028
Ravenna Arsenal Inc. and
Physics International
Company
U.S. Army Ravenna Army
Ammunition Plant



RAVENNA ARSENAL, INC.

8451 STATE ROUTE 5, RAVENNA, OHIO 44266-9297
TELEPHONE: (216) 358-7111 • FAX: (216) 297-3216

100-12
2 9.00

March 11, 1991

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

TO	3/13/91
CR-DOR	
CONT ADM	
PROP ADM	
QASAS	
SECURITY	
RAI	
RETURN FOR FILE	

Subject: Meeting Summary

Dear Sir:

Attached is a summary of the meeting held at the Ohio EPA Office, Columbus, Ohio. Attendees were representatives of Ohio EPA, Ravenna Arsenal, Inc., Physics International and Olin Corp. The Meeting subjects were the disposition of the Physics International RCRA Permit, and the proposed Exemption Order to be issued to RVAAP.

Let me know if I can answer any questions about the meeting.

Sincerely,

RAVENNA ARSENAL, INC.

H. R. Cooper
Plant Engineer

HRC/wt/hc91005

Attachment

100-12

CF: AMSMC-15E DR (RAIN)
AMSMC-DPO (Huse)
AMSMC-PCB-B (Wise)
CER, INAAP, (LTC Kerley)

miled
3/14/91

SUMMARY OF MEETING
Between Representatives of
Ohio EPA, Physics International, Ravenna Arsenal, Inc.
and Olin Corporation

Meeting agenda and attendance lists are attached

Physics International Permit

Physics International confirmed that they wish to withdraw their Ohio EPA RCRA permit for open burning.

George Pain asked for Ohio EPA's agreement to accept a letter justifying delay of closure of the open burning facility until the RVAAP Demolition Area is closed. He referenced Ohio EPA regulation 3745-50-47. He described the Open Burning Area as a small area within a larger area. This larger area has RCRA interim status under USEPA as RVAAP open detonation area. It is also included in the RVAAP request to the Ohio EPA for a Part B permit. Mr. Pain explained how this description is consistent with the CAFO which was negotiated with the USEPA.

Ohio EPA agreed that the permit should be able to be withdrawn in the requested matter. They did question the proper place in the Part B permit to put the sampling and analytical data required by the CAFO. They felt it should be in the body of the Part B permit rather than in the Solid Waste Management Unit (SWMU) section if the OB area is to be incorporated into the Demo Area and closure deferred until the entire site is closed. They said they would review the Part B to satisfy themselves that it adequately encompasses the area in question. They are reviewing the entire Part B submission at this time. Any clarification concerning the burn area will be addressed in the Notification of Deficiency Letter that will result from this review.

I reminded them that we would have to allow time for review of any revisions by the Army before the revisions could be submitted to Ohio EPA.

Proposed Exemption Order

Mark Navarre, Ohio EPA Legal Section asked several questions to clarify our comments to the Draft Exemption Order. This exemption order is intended to allow RVAAP to conduct OB/OD operations without requesting Emergency Permits for each activity.

He asked if the Deactivation Furnace will be used again. We answered no, it is being closed now.

He asked us if we needed to have storage in excess of 90 days. We do.

He explained that since we do not have Interim Status with USEPA for Storage that he must place limits on the time of storage and on the quantity of storage that will be allowed under the order.

He asked us to consider alternatives which would limit time/quantity and then provide the minimum time/quantity that would be required. They could not assure us that any limits we agree to for the Exemption would not be imposed into the final permit. Ravenna agreed to look at alternatives and provide the required quantities and times.

Ed Lim said that the target for our permit is to be submitted to the Hazardous Waste Review Board by Dec. 31, 1991. He could not predict how long the Review Board would take. It sounded as if it could take another year or more.

Emergency Permits

In a separate meeting between Tom Chanda and Alan Harness, an Emergency Permit was finalized for Open Burning.



H. R. Cooper

cc: COR (2)
N. Wulff
P. Cross
T. Chanda
H. Cooper

Permit 29.00

SEARCHED	
SERIALIZED	
INDEXED	
FILED	
MAR 20 1991	
RAI	
RETURN FOR FILE	

SMCRV-CR (200-1a)

20 March 1991

MEMORANDUM FOR Commander, U.S. Army Armament, Munitions and Chemical Command,
ATTN: AMSMC-ISE, (DR. Crain), Rock Island, IL 61299-6000

SUBJECT: Meeting 7 March 1991 Ohio EPA, Physics International Company (PI),
Ravenna Arsenal, Inc., (RAI) and Olin.

1. References:

- a. Ohio EPA letter, 1 Feb 91, copy previously furnished.
- b. RAI letter, 11 March 91, Subject: Meeting Summary, copy previously furnished.
- c. Olin letter, 11 Mar 91, Subject: RVAAP Facility, Ravenna, Ohio RCRA Permit, copy enclosed.

2. The OHEPA letter required PI to either pay \$1,000 annual fee for the cited area, submit a closure plan, or have RVAAP submit a RCRA Part A to add the cited area. The Army has stated all along that the cited area is a PI problem and the area should be closed by them.

3. Olin's reply to OHEPA, 11 Mar 91, has deviated from the initial remedial action recommended by the EPA. Olin is recommending that it be considered an "active" RCRA unit within an "active" detonation area. This would probably require an amendment to our RCRA Part B.

4. Discussions with RAI indicate that they naturally agree with Olin. Mr. Cooper, of RAI Engineering, stated a closure of the area would probably be impossible as it is surrounded by the detonation area. However, tests of the area surrounding the cited area indicate no contamination.

5. Request your office recommend course of action, if any should be taken at this time.

6. POC is Mr. Robert J. Kasper, DSN 346-3124.

FOR THE COMMANDER:

Encl
as stated

ROBERT J. KASPER
Commander's Representative

CF:
AMSMC-DPO (Mr. Ghose)
AMSMC-PCG-B (Ms. Wise)
Cdr, INAAP (LTC Kerley)

*mailed
3/20/91*



file

RAVENNA ARSENAL, INC.
8451 STATE ROUTE 5, RAVENNA, OHIO 44266-9297
TELEPHONE: (216) 358-7111 • FAX: (216) 297-3216

August 21, 1991

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

TO: Envirotrol Inc.
ATTN: Mr. Bill Zinsser, Sales Engineer
432 Green Street
PO Box 61
Sewickley, PA 15143-0061

Subject: Ravenna Army Ammunition Plant's Shipment of Less Than 10
Drums of Spent Activated Carbon to Envirotrol Inc. for
Reclamation Processing

Dear Mr. Zinsser:

In the past several weeks you and this installation's Environmental Engineer, Thomas M. Chanda, have had telephone discussion regarding the abovementioned subject matter. The Ravenna Army Ammunition Plant (RVAAP) is negotiating with the Ohio EPA on an agreement to facilitate its Hazardous Waste Operations under RCRA Interim Standards. The Ohio EPA prefers that all storage of RVAAP's EPA listed hazardous waste, K045, Explosive Contaminated Spent Carbon, be less than 90 days. In order to comply with Ohio EPA's preference, RVAAP views as the best alternative an agreement whereby Envirotrol, Inc. would accept quantities of carbon that are less than your standard minimum quantity. This agreement would only be required until a RCRA Part B permit is issued which is now estimated to be in 1993.

The basic agreement to this transaction is that RVAAP will be permitted to ship less than 10 barrel quantities of the K045 carbon to Envirotrol, Inc. for purposes of material reclamation. In return, Envirotrol would require a 10 barrel minimum service fee to accept the smaller quantity for processing. All other attached fees pertinent to Pennsylvania MOD I analysis and material transport would remain the same under the current service price structure. RVAAP quantities of 10 each barrels or greater shipped to your facility would obviously incur normal Envirotrol customer service transactions.

For purposes of verification to the regulator that RVAAP has achieved a feasible alternative to manage K045 spent carbon, we ask that you provide signature of concurrence as delineated below. One copy is provided for your file and one signed copy should be returned to our facility for regulator review.

This installation's points of contact are for the Government, Mr. Robert J. Kasper, Commander's Representative, at phone 216-297-3124, and Ravenna Arsenal, Inc. Thomas M. Chanda, Environmental Engineer 216-297-3221.

Sincerely,

RAVENNA ARSENAL, INC.

CONCURRENCE:



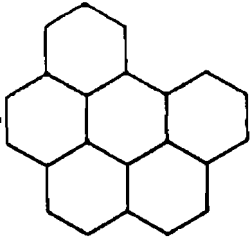
H.R. Cooper
Plant Engineer

Signature/Date

TMC/ade

cc: N. Wulff
T. Chanda
B. Jenkins
File

cf: Commander
AMCCOM
ATTN: AMSMC-ISE-E (Capt. William Metcalf)
Rock Island, IL



ENVIROTROL, INC.

432 Green Street, P.O. Box 61 • Sewickley, Pennsylvania 15143-0061
(412) 741-2030 • FAX 412-741-2670

August 21, 1991

O. J. JENKINS
AUG 22 1991

Mr. Bill Jenkins
Ravenna Arsenal, Inc.
8451 State Route 5
Ravenna, Ohio 44266

cc: Tom Chandler
Process me and
PO if an annual
contract is needed.
cc: Ftz (mgr) BJJ

Dear Mr. Jenkins:

I am writing to provide confirmation of the agreement reached via telephone.

Ravenna Arsenal Inc. will be permitted to ship quantities of less than 10 drums (2000 lb. reactivated weight) of K045 coded spent activated carbon waste to Envirotrol for reclamation. In return, Envirotrol will require a minimum charge of \$1,200.00 for custom segregated reactivation of each lot. This price is based on our minimum quantity of 2000 lbs. at a cost of \$0.60/lb.

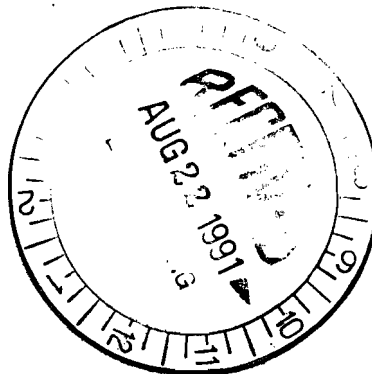
All other attached fees will remain the same for these undersize shipments and the shipments in excess of ten (10) drums will be invoiced in accordance with the fee schedule issued to you on July 15, 1991.

Please feel free to call me with any additional questions concerning our activated carbon services.

Sincerely,

William D. Zinsser
Sales Engineer

WDZ/sjs





Exemption Order
RAVENNA ARSENAL, INC.
8451 STATE ROUTE 5, RAVENNA, OHIO 44266-9297
TELEPHONE: (216) 358-7111 • FAX: (216) 297-3216

October 22, 1991

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

TO: State of Ohio Environmental Protection Agency
P.O. Box 1049
ATTN: Mr. Donald R. Schregardus, Director
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Subject: Draft Exemption Order Issued to Ravenna Army Ammunition Plant

1. References:
 - a. OHEPA Draft Exemption Order Dated 27 March 1990
 - b. Ravenna Army Ammunition Plant's 5 July 1990 Letter Requesting Changes to 27 March 1990 OHEPA Draft Order

Dear Mr. Schregardus,

In a July 10, 1991 RCRA B Permit technical review meeting at your Agency's central office between Ravenna Army Ammunition Plant (RVAAP) and respective Ohio EPA representatives, the referenced exemption order was discussed.

The only unresolved issue was RVAAP's request to be permitted to store hazardous waste for greater than a 90 day period. This request was made primarily for RVAAP's listed K045 waste explosive contaminated activated carbon. On occasions, RVAAP generates K045 waste in quantities less than ten barrel volumes. The only known reclaimer for K045 waste, Envirotrol, Inc., had notified RVAAP it would not take quantities less than 10 barrels. Consequently, RVAAP would need to store K045 waste for extended periods of time in order to accumulate the acceptable quantities.

RVAAP, in its comments on the Draft Exemption Order, had requested that storage in excess of 90 days be included in the Exemption Order. Your agency asked RVAAP to try to find a way of staying within the 90 day limit. RVAAP has gotten Envirotrol to agree to accept less than 10 barrels of spent activated carbon, K045, for

treatment. RVAAP will be paying a minimum charge based on 10 barrels. (See Envirotrol letter attached as Attachment #1.)

Therefore, RVAAP will drop its request for greater than 90 day storage under the Exemption Order. The following comments which were included in our 5 July 1991 comment letter should be addressed in the final Exemption Order.

1. Paragraph 1.a. of the orders be changed to read "... to the storage, of all materials to be so treated before and after such treatment."
2. The financial liability requirements cited in paragraph 1.f of the orders be deleted, as such requirements do not apply to a federal facility.
3. The reference in paragraph 1.j. of the orders to Mr. Thomas Chanda be changed to read "the Environmental Engineer."
4. The order must be signed on behalf of RVAAP by the Commander's Representative, Robert J. Kasper instead of Thomas Chanda.
5. The following language be incorporated into the Exemption Order.

FUNDING

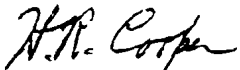
"It is the expectation of RVAAP that all obligations arising under this order will be fully funded. RVAAP agrees to seek sufficient funding through the Army budgetary process to fulfill its obligations under this order. Notwithstanding, any requirement for the payment or obligation of funds established by the terms of this order shall be subject to the availability of appropriate funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. S1341."

Any questions that should arise in the development of the final Exemption Order can be directed to this installation's points

of contact who are for the Government; Robert J. Kasper, Commander's Representative at 216-297-3124, and for Ravenna Arsenal, Inc.; Thomas M. Chanda, Environmental Engineer at 216-297-3221.

Sincerely,

RAVENNA ARSENAL, INC.



H. R. Cooper
Plant Engineer

TMC/wt/tc9141

cf: AMSMC-GSR
ATTN: John Rock w/att.

AMSMC-ISE-M
ATTN: Cpt. William Metcalf w/att.

Ohio EPA, NEDO
ATTN: Ahmed Hawari w/att.

Ohio EPA, Columbus
ATTN: Ed Lim w/att

cf: N. Wulff w/att.
T. Chanda w/att.
File w/att.

RAVENNA ARSENAL, INC.

TELEPHONE CONVERSATION RECORD

November 7, 1991

PERSON CALLING: Harold Cooper

PHONE: 297-3240

PERSON CALLED: Nathan Kirk
Department of Natural Resources
Division of Forestry

PHONE: 614-265-6711

SUBJECT: Applicability of Executive Order 91-206V
Burning Ban for 35 Ohio Counties, to Ravenna
AAP

I called the Governor's office to obtain a determination as to whether Ravenna AAP's burning ground operation qualified for an exemption from the burning ban. They referred me to the Department of Natural Resources as the responsible department. They identified Nathan Kirk in the Division of Forestry as the person who could make the determination I was asking for.

I explained why I was calling and gave Mr. Kirk the following information:

1. Ravenna AAP is an Army owned facility which generates explosive and propellant waste from its operations.
2. RVAAP had emergency hazardous waste permits and open burning permits to allow burning the material. We were requested to stop burning when the ban was announced.
3. We need to continue burning in order to avoid exceeding 90 day storage limits on our hazardous waste.
4. We burn in refractory lined metal pans which are located on a gravel pad approximately 80 to 100 feet by 80 to 100 feet square.
5. The gravel pad is for the most part surrounded by bare ground for a distance of 200 feet or more from the pad. The bare ground is a result of burning that was conducted earlier in the summer. Small patches of brush do exist within the 200 feet area. We propose to remove that vegetation prior to resuming burning.

6. When explosive and propellant is burned they are completely consumed in a matter of a few minutes so that there are no long lasting embers as with a wood fire.
7. RVAAP restricts its burning to times when wind speed is less than 20 MPH and is in a direction that prevents spread of the fire.
8. RVAAP has its own fire department and stations a truck at the Burning Grounds when fires are ignited and until they have safely cooled off.
9. The entire 200 acre burning area is surrounded by a 50 foot wide fire break.

Mr. Kirk said that, based on the above information (particularly the 200' bare ground area around the pad), RVAAP's burning pad qualifies as exempted from the burning ban.

I told him that before we resumed burning we would assure that any brush within the 200' radius was removed and that we would notify the Akron Air Pollution Control Agency and the Ohio EPA hazardous waste office of your determination. He said they could call him if they have any questions.

cf: COR
N. Wulff
T. Chanda
R. Holford
G. Wolfgang
Security/Fire
File

Due Date
Schedule f/ O&EA
meet.

* AMCOM - Propellant - Request Assistance
* briefing w/ State Directors O&EA (post AMCOM)

→ ① Yearly Variance Request
② Difficulties in obtaining

→ Propellant alternatives
↓
other sources
Fuel Research

Other Facilities to open burn - Availability
Explosive Waste Incinerators → Ability to CB

Letter

* List/priorities APP ^{sites} waste - impact/potential

Indiana APP has variance w/ the
State to conduct CB

- Not Only Propellant - what about Scrap
Explosives - ZL#?

OB of PEP

- 1) What is the status w/ other facilities that have EWI?
- Can they accept the material?
 - What is the quantitative abilities of material w/ an EWI
 - a) Explosives
 - b) Propellants
 - Emissions data available

Cooper

EF110
Original 1991

Issuance Date _____
Effective Date _____

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of

Ad. 6: NAT ->

RAVENNA ARSENAL, INC.	:	
Ravenna Army Ammunition Plant	:	Director's Final
8451 State Route 5	:	Findings and Orders
Ravenna, Ohio 44266-9267	:	

Pursuant to Chapter 3734 of the Ohio Revised Code ("ORC"), the Director of Environmental Protection makes the following Findings and issues the following Orders:

FINDINGS

1. Ravenna Arsenal, Inc. ("Ravenna Arsenal") operates the Ravenna Army Ammunition Plant ("RVAAP"), a facility owned by the United States Army and engaged in the storage and treatment of munitions and munition derivatives.
2. On March 31, 1981, RVAAP/Ravenna Arsenal submitted a RCRA Part A application to Ohio EPA. The application was a copy of the application filed with U.S. EPA. RVAAP/Ravenna Arsenal has obtained interim status from U.S. EPA for storage and thermal treatment (U.S. EPA I.D. No. OH5 210 020 736).
3. In October, 1981, the Ohio Hazardous Waste Facility Board ("HWFB") issued permits to all facilities that were "in operation" immediately prior to October 9, 1980. RVAAP was not "in operation" at that time in the sense that it was not engaged in the production of munitions. RVAAP was, however, engaged in other activities, including storage, inspection and demilitarization, involving periodic thermal treatment by open burning and detonation.
4. Due to uncertainty on the part of both RVAAP and Ohio EPA as to RVAAP's regulatory status, HWFB did not issue a permit to RVAAP or Ravenna Arsenal.
5. RVAAP/Ravenna Arsenal have lawfully conducted thermal treatment activities pursuant to Ohio law through exemptions, granted on October 1, 1985 and May 19, 1986, and through emergency permits. Twelve emergency permits have been issued to RVAAP/Ravenna Arsenal since September 1987. The most recent permit was issued on December 13, 1990, effective until January 17, 1991.
6. RVAAP/Ravenna Arsenal filed a RCRA Part B permit application with Ohio EPA on November 8, 1988.

copy
not permitted
since
12/13/90

Director's Final Findings and Orders
Ravenna Army Ammunition Plant
PAGE TWO

7. Pursuant to ORC Section 3734.02 (G) and Rule 3745-50-31 of the Ohio Administrative Code, the Director of Environmental Protection (the "Director") may by order exempt any person generating, storing, treating, or disposing of hazardous wastes in such quantities or under such circumstances that, in the determination of the Director, it is unlikely that the public health or safety, or the environment will be adversely affected thereby, from any requirement to obtain a permit or license, or comply with the manifest system or other requirements of ORC Chapter 3734.
8. It is environmentally beneficial for the State of Ohio to allow RVAAP/Ravenna Arsenal to continue to store and treat munitions and munition derivatives in a manner that is safe to the public, the environment, and personnel at RVAAP. If RVAAP/Ravenna Arsenal conducts its treatment activities in accordance with the Orders herein, it is unlikely that the public health or safety, or the environment will be adversely affected.
9. This action is consistent with, and equivalent to, the regulations promulgated by the Administrator of the United States Environmental Protection Agency under the "Resource Conservation and Recovery Act of 1976," 90 Stat. 2798, 42 U.S.C. Section 6921, et seq., as amended.

ORDERS

1. An exemption is hereby granted to RVAAP/Ravenna Arsenal to store and treat munitions and munition derivatives, as required by continuing facility operations, provided the following conditions are met:
 - a. The exemption applies only to thermal treatment by open burning, by open detonation, or by detonation in the deactivation furnace, and to the storage of all materials to be so treated before and after such treatment, provided that, in accordance with subparagraph 1., no hazardous wastes shall remain on-site for more than ninety (90) days.
 - b. At least thirty (30) days before any thermal treatment is conducted, RVAAP/Ravenna Arsenal must submit to Ohio EPA's Northeast District Office a treatment plan which identifies the type and quantity of each material to be treated by open burning, by open detonation, and/or by detonation in the deactivation furnace. The plan shall also describe the chemical or explosive composition and weight of each material, provide notification of the date(s) upon which treatment will be conducted, and identify the location of each treatment area.

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- c. After receiving the treatment plan identified in subparagraph b., Ohio EPA shall be afforded an opportunity to inspect the treatment site(s) before treatment begins.
- d. RVAAP/Ravenna Arsenal shall conduct all treatment activities in compliance with Ohio Administrative Code ("OAC") Rule 3745-68-82: "Open burning; waste explosives" and all applicable air pollution requirements, including OAC Chapter 3745-19.
- e. RVAAP/Ravenna Arsenal shall comply with OAC Rule 3745-50-58: "Conditions applicable to all permits," which conditions are incorporated herein by reference.
- f. RVAAP/Ravenna Arsenal shall comply with the following rules of the Ohio Administrative Code which are incorporated herein by reference:

3745-54-14(A), (B)	- Security
3745-54-15(A)	- General Inspection Requirements
3745-54-17(A), (B)	- General Requirements for Ignitable, Reactive or Incompatible Waste
3745-54-31	- Design and Operation of Facility
3745-54-32	- Required Equipment
3745-54-33	- Testing and Maintenance of Equipment
3745-54-34	- Access to Communications or Alarm System
3745-54-37	- Arrangements with Local Authorities
3745-54-55	- Emergency Coordinator
3745-54-56	- Emergency Procedures
3745-54-73 (A), (B)(1), (B)(2)	- Operating Record
3745-54-74	- Availability, Retention and Disposition of Records
3745-55-11	- Closure Performance Standards
3745-55-14	- Disposal or Decontamination of Equipment

- g. All treatment activities shall be conducted in areas specifically selected to minimize any deleterious effects on the public and the environment. Selection of each treatment area shall be made on the basis of topography, wind direction, proximity to utility lines and/or other man-made constructions, and other relevant factors. RVAAP/Ravenna Arsenal shall also take all appropriate

*implied
10/20/00 references*

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measures to minimize noise occasioned by treatment activities.

- h. RVAAP/Ravenna Arsenal shall provide adequate security for all treatment activities, to prevent the entry of unauthorized persons into dangerous areas. Adequate fire-fighting and first aid equipment shall be made available by RVAAP/Ravenna Arsenal and/or by the local fire department.
- i. Handling and transportation of waste to the treatment area(s) shall be accomplished by persons with experience and/or training in the handling of reactive, explosive and ignitable materials. All wastes shall be properly packed and stabilized prior to transportation.
- j. All open burning and detonation shall take place under the direct supervision of the Environmental Engineer, Ravenna Arsenal, Inc., or his authorized designee.
- k. RVAAP/Ravenna Arsenal shall inspect the treatment area after each open burning or detonation for untreated waste and shall determine whether any residues are hazardous wastes pursuant to OAC Rules 3745-50-01 et seq., with such determination subject to confirmation by Ohio EPA. All residues determined to be hazardous waste shall be managed as such pursuant to OAC Chapters 3745-50 et seq.
- l. RVAAP/Ravenna Arsenal shall conduct each and every treatment activity in accordance with the treatment plan previously filed with Ohio EPA. Within seven (7) days after each treatment activity is completed, RVAAP/Ravenna Arsenal shall notify Ohio EPA's Northeast District Office, in writing, that treatment is complete. Such notification shall also include information concerning the disposition of any hazardous wastes generated as a result of treatment activities. With the exception of the accumulation of as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where such wastes initially accumulate, as permitted by, and in a manner consistent with, Ohio Administrative Code Rule 3745-52-34(C), no hazardous waste treatment residues shall remain on-site for more than ninety (90) days.
- m. It is the expectation of RVAAP/Ravenna Arsenal that all obligations arising under this order will be fully funded. RVAAP/Ravenna Arsenal agrees to seek sufficient funding through the Army budgetary process to fulfill its obligations under this Order. In any action to enforce

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any provisions of these Final Findings and Orders, RVAAP and Ravenna Arsenal may raise the defense that the Anti-Deficiency Act, 31 U.S.C. Section 1341 et seq., prohibits their compliance because of the unavailability of funding. While Ohio EPA does not necessarily agree that such a defense exists, it is, however, agreed upon by Ravenna Arsenal, RVAAP, and Ohio EPA that it is premature at this time to raise and adjudicate the existence of such a defense, and that the appropriate time to raise and adjudicate such a defense is, if ever, at the time that an enforcement action is commenced. Acceptance of these Final Findings and Orders by Ravenna Arsenal and RVAAP does not constitute a waiver by Ravenna Arsenal and RVAAP of any rights or defenses they may have under applicable law.

2. RVAAP/Ravenna Arsenal, by its acceptance of this exemption, agrees to comply with all conditions of the exemption and acknowledges that RVAAP/Ravenna Arsenal's failure to so comply may result in immediate revocation of this exemption and, if appropriate, further legal action by Ohio EPA.
3. This exemption shall be effective until the HWFB has made a final determination on RVAAP/Ravenna Arsenal's Part B permit application.

IT IS SO ORDERED:

Donald R. Schregardus, Director
Ohio Environmental Protection Agency

Date

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WAIVER

Ravenna Arsenal and Ravenna Army Ammunition Plant hereby waive the right to appeal the issuance, terms, and service of these orders, and hereby waive any and all rights they might have to seek judicial review of these Final Findings and Orders, either at law or in equity. In the event that these Final Findings and Orders are appealed by any other party to the Environmental Board of Review or any court, nothing in these Final Findings and Orders shall preclude the right of Ravenna Arsenal or Ravenna Army Ammunition Plant to intervene and participate in such appeal. In such event, Ravenna Arsenal and Ravenna Army Ammunition Plant shall continue to comply with these Final Findings and Orders notwithstanding such appeal and intervention unless these Final Findings and Orders are stayed, vacated, or modified.

IT IS SO AGREED:

RAVENNA ARSENAL, INC.

By: _____

RAVENNA ARMY AMMUNITION PLANT

By: _____
Robert J. Kasper Date

OHIO ENVIRONMENTAL PROTECTION AGENCY

By: _____
Donald R. Schregardus Date
Director