

Ohio Environmental Protection Agency (OEPA)

And

Ravenna Army Ammunition Plant (RVAAP)

1994 Correspondences

State of Ohio Environmental Protection Agency

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

George V. Voinovich
Governor

August 29, 1994

Suspense Date: _____
Response By: _____

8/29/91

ARMY	
NAVY	
AIR FORCE	
COAST GUARD	
OTHER	

STOP
NO FILE

CONTRACTOR
FW D FOR

☐ Information
☐ Compliance **as**
applicable
☐ Reply NLT _____

Re: Renewing Coverage under NPDES General Permit for Storm Water
Associated with Industrial Activity, OHR000002

Dear Permittee:

The above-referenced general permit was renewed on August 9, 1994. There are no substantive changes between the initial and renewal industrial permits.

In order to continue general permit coverage, you must submit a new Notice of Intent (NOI) within ninety (90) days of the date of this letter, otherwise, your general permit coverage is automatically terminated. A revised NOI and instructions are enclosed for your use. A check for \$100.00 made payable to Treasurer, State of Ohio must accompany the NOI for it to be considered complete.

If you have questions, please contact John Morrison at (614) 644-2259, Mohammad Islam at (614) 644-2015, or me at (614) 644-2034.

Sincerely,

Robert E. Dieper

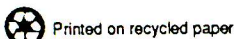
Robert E. Phelps, P.E.
Manager, Permit Administration Section
Division of Surface Water

REP/tv

Enclosures

RECEIVED

AUG 29 1994



What is a NOI Form?

NOI stands for **Notice of Intent**. It is a one-page application form to inform the Ohio EPA of a desire to obtain or renew coverage under a general permit. The applicant must certify their intention to comply with the general permit. The form shall be submitted to the Ohio EPA Central Office.

Who Must File a NOI Form?

Any discharge of water, with certain exceptions for storm water, from a point source must obtain a permit from the Ohio EPA. Federal law at 40 CFR 122 and the Ohio Revised Code at Chapter 6111.03(J) prohibit point source discharges to waters of the State without first obtaining a National Pollutant Discharge Elimination System (NPDES) permit. This includes point source discharges of storm water associated with industrial activity (including construction). A facility with a discharge must apply for a permit using this form (for a general permit) or Form 1 and the appropriate supplementary forms (for an individual permit).

It is critical for each applicant to meet the requirements found in the permits in Parts I.B. (Applicability), I.C. (Eligibility), and VI (definition of the category). **Do not** submit the NOI form unless you meet **all** of the requirements in those sections. The following is a list of the various discharges that may be covered by a general permit.

General Permit Authorization to Discharge:

1. Storm Water associated with Industrial Activity
2. Storm Water associated with Construction Activity
3. Coal Strip Mining Activities
4. Storm Water associated with Industrial Activity
for Group Applicants

General Permit Number:

OHR000002
OHR100...
OHM000001
OHG000001

Facility Address/Location: Enter the facility's or site's complete physical address, including city, state, zip code, county, and township, **OR** if the facility, except coal surface mines, lacks a street address, indicate the state, latitude and longitude of the facility to the nearest 15 seconds (provide coordinates as: (degrees) (minutes) (seconds) using 2 digits in each space), **OR** the quarter, section, township, and range (to the nearest quarter section) of the approximate center of the facility. If a site is located in more than one township and/or section, please list all townships/sections. The first listed township/section should be the one that contains the main entrance to the facility. **IN THE CASE OF COAL STRIP MINING OPERATIONS**, provide county, township, and section number(s). Coal strip mine applicants are to attach to NOIs an 8½" x 11" site map [using 7.5 min. United States Geological Survey (USGS) topo map]; the map shall clearly show the affected area and location of treatment ponds with outfalls labeled 001, 002, etc. The map shall be labeled with its USGS topo map name. USGS maps are available from: Map Distribution, US Geological Survey, Building 41, Box 25286, Federal Center, Denver Colorado 80225; and are sold by commercial map dealers which would be listed in the phone book; or might be available at a public library.

Quarter/Section/Range: These may need to be completed if the facility or site does not have a street address. Please refer to the section above entitled "Facility Address/Location" for further explanation.

Receiving Stream: If a facility discharges directly to receiving water(s), enter the name of the receiving water (if initial water(s) does not have a name, then write as "unnamed tributary to" first subsequent water that has a name). It is important that the name of the receiving waterbody where the discharge directly goes is listed. If a facility discharges to more than one receiving stream, list all receiving streams.

- If a facility discharges to a municipal separate storm sewer system (MS4), enter the name of the receiving waterbody to which the MS4 discharges. An MS4 is defined as "a conveyance that is owned or operated by a state, city, town, county, district, association, or other public body that is designed or used for collecting or conveying storm water".

MS4 Operator Name: Enter the name of the operator of the municipal separate storm sewer system (MS4) (e.g. municipality name, county name).

"State Nature Preserve": If you are aware of a state nature preserve, in accordance with Ohio Revised Code 1517.05, within 1,000 feet of the boundaries of your facility/site, then place an "X" in the associated space.

"River Code": If the facility's discharge is to a river designated as scenic, wild, or recreational, or to a tributary within 1,000 feet of one of these segments, enter the appropriate river code in this space. Please refer to Attachment A of these instructions for the appropriate code to be entered in this space.

General Permit Number: Enter the general permit number for which coverage is being sought. The first two spaces of the number are "OH"; fill in the remaining characters. Please refer to the above section entitled "Who Must File a NOI Form?" for a list of general permit names and numbers.

Initial/Renewal Coverage: Place an "X" in the appropriate space.

Initial = the facility has never been covered by the general permit for which you are applying.

mining applicants. Please enter the outfall numbers as three digits (e.g. 001, 002, 603, 901, etc.). If you have five or more outfalls, please list them on an additional sheet.

Design Flow: This item does not apply to storm water or coal strip mining applicants. For the corresponding outfall, please indicate in million gallons per day (MGD) the average design flow of the outfall or treatment system. Applicants for any of the three storm water permits should leave this blank.

Latitude/Longitude: This item does not apply to storm water construction activity or coal strip mining applicants. Please indicate the latitude and longitude of the point of discharge (outfall) to the nearest 15 seconds (provide coordinates as: degrees minutes seconds using 2 digits in each space; do not use symbols).

Project Start/Completion Date: Only construction activity and coal strip mining applicants must complete this portion. Enter the project approximate start date and estimated completion date for the entire development plan or for final bond release. Provide dates as: month day year using two digits in each space; do not use symbols.

Total Size of Site: Only construction activity and surface coal mining applicants must complete this portion. Provide an estimate of the total number of acres of land that will be disturbed (round to the nearest acre).

Payment Information: A \$100 check (non-refundable) made payable to "Treasurer, State of Ohio" must accompany all NOIs. The check number and check date must be typed on the NOI to ensure complete processing. Provide dates as: month day year using two digits in each space.

Certification

Federal and State statutes provide for severe penalties for submitting false information on this application form. Federal regulations require this application to be signed as follows:

For a corporation: by a responsible corporate officer, which means: 1) president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions; or 2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

For a partnership or sole proprietorship: by a general partner or the proprietor; or

For a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

For specific information about the eligibility requirements of the general permit you wish to apply for and any changes since the date of these instructions, contact the Ohio EPA general permit number at (614) 644-2053.



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

September 30, 1994

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

TO: Ohio Environmental Protection Agency
Division of Surface Water
P. O. Box 163669
Columbus, Ohio 43216-3669
ATTN: Mr. Robert E. Phelps, Manager, Permit Administration Section

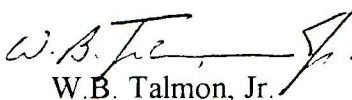
Subject: Renewing Coverage under Ravenna Army Ammunition Plant's General Permit for
Storm Water, OHR000262

Dear Sir:

Attached are the completed Compliance Status Report and Notice of Intent forms and a check in the amount of \$100.00 for the renewal of the Ravenna Army Ammunition Plant's General Permit for Storm Water Associated with Industrial Activity.

The Mason & Hanger point of contact for this subject is Mr. William B. Talmon, Jr., Site Manager, at (216) 358-7400.

Sincerely,
Mason & Hanger-Silas Mason Co. Inc.


W.B. Talmon, Jr.
Site Manager

WBT

cc: File
Environmental

Ohio EPA Division of Surface Water
Compliance Status Report for
Industrial Activity Storm Water General Permit

018K000252

~~THOMAS H. SHANNON - ENVIRONMENTAL~~
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, OH 44266

Mailing Label Corrections:

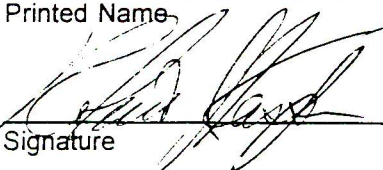
ROBERT J. KASPER, CMDR. REP.

Please complete the following questions for the above referenced storm water general permit.

- 1) Has a Storm Water Pollution Prevention Plan (SWPPP) been prepared? Yes X, Date 4/94 No _____
- 2) Is the facility subject to reporting for SARA Title III, Section 313 for SARA Section 313 water priority chemicals? Yes _____ No X
(Go to question 3) (Go to question 4)
- 3) If yes to question 2, has the SWPPP been certified by a professional engineer? Yes _____, Date _____ No _____
- 4) Is the facility required to monitor? Yes X No _____
- Is sampling complete? Yes X Date 9/29/94 No _____
- 5) Certification for compliance status report

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Robert J. Kasper
Printed Name


Signature

Commander's Representative
Title

10 Oct 94
Date

Please return completed form to:

Ohio EPA, Division of Surface Water, P. O. Box 163669, Columbus, OH 43216-3669



Notice of Intent (NOI) For Coverage Under Ohio Environmental Protection Agency General Permit

(Read accompanying instructions carefully before completing this form)

Submission of this NOI constitutes notice that the party identified in Section I of this form intends to be authorized to discharge into state waters under the NPDES general permit program. Becoming a permittee obligates a discharger to comply with the terms and conditions of the permit. Complete all information — THIS FORM MUST BE COMPLETELY TYPEWRITTEN AND AN ORIGINAL (not a copy) — NOT FOLDED OR STAPLED — FOR PROPER ELECTRONIC SCANNING. Forms transmitted by fax will not be accepted. A check in the amount of \$100, payable to "Treasurer, State of Ohio", must accompany this form.

I. Applicant Information/Mailing Address

Company Name: RAVENNA ARMY AMMUNITION PLANT, U.S. ARMY
Contact Person: ROBERT J. KASPER, COMMANDER'S REP. Phone: (216) 358-7311
Mailing Address: 8451 STATE ROUTE 5
City: RAVENNA State: OHIO Zip: 44266-9297

II. Facility/Site Location Information

Facility Name: RAVENNA ARMY AMMUNITION PLANT
Facility Contact Person: ROBERT J. KASPER, COMMANDER'S REP. Phone: (216) 358-7311
Facility Address/Location: 8451 STATE ROUTE 5
City: RAVENNA State: OHIO Zip Code: 44266-9297
County: PORTAGE/TRUMBULL Township(s): _____
Quarter: _____ Section(s): _____ Range: _____
Receiving Stream: HINCKLEY CREEK, EAGLE CREEK, MAHONING RIVER
MS4 Operator Name: _____

If aware of a state nature preserve within 1,000 feet of the facility/site, check here: _____

Enter river code here, if discharge is to a river designated scenic, wild, or recreational, or to a tributary within 1000 feet (see instructions): _____

General Permit Number: OH R 0 0 0 2 6 2 Initial Coverage: _____ Renewal Coverage: X

General Permit Authorization to Discharge: INDUSTRIAL ACTIVITY

Type of Activity: HZ

SIC Code(s): 2892

Existing NPDES Permit Number: 3IO00000

ODNR Coal Mining Application Number: _____

Outfall	Design Flow (MGD)	Latitude	Longitude
<u>901</u>	_____	<u>41°10'45"</u>	<u>81°11'00"</u>
<u>902</u>	_____	<u>41°09'45"</u>	<u>81°09'15"</u>
<u>903</u>	_____	<u>41°09'45"</u>	<u>81°08'00"</u>
<u>904</u>	_____	<u>41°10'30"</u>	<u>81°04'30"</u>

Proposed Project Start Date (MO DY YR): _____

Estimated Completion Date: (MO DY YR): _____

Total Size of Site (Acres): _____

Payment Information: Check # 931668 Date of Check 09-30-94

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

Name (typed): Robert J. Kasper, Commander's Representative Date: 12/28/94

Signature: _____

<u>OUTFALL</u>	<u>LATITUDE</u>	<u>LONGITUDE</u>
905	41°10'45"	81°03'00"
906	41°10'50"	81°02'30"
907	41°12'45"	80°58'45"
908	41°13'45"	81°01'45"

State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
FAX (614) 644-2329

TO 10/27/95
L CR
CONT ADM
PROP ADM
CONTRACTOR
RETURN FOR FILE

George V. Voinovich
Governor

10/24/94

ROBERT J KASPER
UNITED STATES ARMY
8451 STATE ROUTE 5
RAVENNA, OH 44266

CONTRACTOR
FWD FOR
☒ Information
☒ Compliance as applicable
☐ Reply NLT _____

Re: Renewal of coverage under Ohio EPA General Permit for **Storm Water** Associated with Industrial Activity,
OHR000002

Dear Permittee:

The Ohio Environmental Protection Agency has received the Notice of Intent (NOI) for coverage under the industrial activity storm water general permit for:

RAVENNA ARMY AMMUNITION PLANT
8451 STATE ROUTE 5
Ohio EPA Facility Permit Number: 3GR00112

County: PORTAGE
City: RAVENNA

This site/facility is approved for coverage under the Ohio EPA general permit for storm water associated with industrial activity. Please use your Ohio EPA facility permit number in all future correspondence. Note that OHIO EPA has changed its general permit facility numbering system, hence your renewal number is different from you initial number: OHR000262. Enclosed is a copy of the general permit regulating your storm water discharge.

Please read and review the permit carefully. The permit contains other requirements and prohibitions with which you must comply. Coverage remains in effect until after a renewal general permit is issued. We will contact you on how to reapply for continuing coverage.

If you have any further questions, you may call our storm water update line at (614) 644-2053. If you need to speak to someone directly, you should call:

John Morrison at (614) 644-2259
Bob Phelps at (614) 644-2034

Mohammad Islam at (614) 644-2015
Loudajean Holloway at (614) 728-1357

Thank you for your cooperation in this matter.

Sincerely,

Donald R. Schlegel

Donald R. Schregardus
Director

DRS/tv

cc: File



Printed on recycled paper

EPA 1613 (rev. 5/94)

OHIO ENVIRONMENTAL PROTECTION AGENCY

GENERAL PERMIT AUTHORIZATION TO DISCHARGE
STORM WATER ASSOCIATED
WITH INDUSTRIAL ACTIVITY UNDER
THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq., hereafter referred to as "the Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111), discharges of storm water from industrial facilities, as defined in Part I.B. of this permit, are authorized by the Ohio Environmental Protection Agency, hereafter referred to as "Ohio EPA", to discharge from the outfalls at the sites and to the receiving waters identified in the applicant's Notice of Intent (NOI) on file with Ohio EPA in accordance with the conditions specified in Parts I through IX of this permit.

Permit coverage is conditioned upon payment of applicable fees and submittal of the Notice of Intent form.

This permit and the authorization to discharge shall expire at midnight on the expiration date shown above. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as are required by the Ohio EPA.



Donald R. Schregardus
Director

Part I. COVERAGE UNDER THIS PERMIT

- A. Permit Area.** This permit covers the entire state of Ohio.
- B. Applicability.** The Act provides that storm water discharges associated with industrial activity from a point source to waters of the United States are unlawful, unless authorized by an NPDES permit. Dischargers with a storm water discharge associated with industrial activity (see definition in Part IX of this permit) which is discharged via a point source (including discharges through a municipal separate storm sewer system) to a waters of the United States are required to submit a permit application in accordance with U.S. EPA regulations. Dischargers that are eligible for coverage under this permit and that submit a Notice of Intent (NOI) in accordance with the requirements of Part II of this permit are in compliance with the NPDES application requirements for such storm water discharges.
- C. Eligibility.**
1. This permit may cover all new and existing point source discharges of storm water associated with industrial activity to waters of the United States, except for storm water discharges identified under paragraph I.C.3.
 2. This permit may authorize storm water discharges associated with industrial activity that are mixed with storm water discharges associated with industrial activity from construction activities provided that the storm water discharge from the construction activity is in compliance with the terms, including applicable NOI or application requirements, of a different NPDES general permit or individual permit authorizing such discharges.
 3. Limitations on Coverage. The following storm water discharges associated with industrial activity are not authorized by this permit:
 - a. storm water discharges associated with industrial activity that are mixed with sources of non-storm water other than non-storm water discharges that are:
 - (i) in compliance with a different NPDES permit; or
 - (ii) non-storm water discharges that are identified by and in compliance with Part III.A.2 of this permit.
 - b. storm water discharges associated with industrial activity which are subject to an existing effluent limitation guideline addressing storm water (or a combination of storm water and process water)¹;
 - c. storm water discharges associated with industrial activity that are subject to an existing NPDES individual or general permit. Such discharges may be authorized under this permit after an existing permit expires provided the existing permit did not establish numeric limitations for such discharges; and

¹ For the purpose of this permit, the following effluent limitation guidelines address storm water (or a combination of storm water and process water): cement manufacturing (40 CFR 411); feedlots (40 CFR 412); fertilizer manufacturing (40 CFR 418); petroleum refining (40 CFR 419); phosphate manufacturing (40 CFR 422); steam electric (40 CFR 423); coal mining (40 CFR 434); mineral mining and processing (40 CFR 436); ore mining and dressing (40 CFR 440); and asphalt emulsion (40 CFR 443 Subpart A). This permit may authorize storm water discharges associated with industrial activity which are not subject to an effluent limitation guideline even where a different storm water discharge at the facility is subject to an effluent limitation guideline.

d. storm water discharges associated with industrial activity that the Director has determined to be contributing to a violation of a water quality standard.

4. Storm water discharges associated with industrial activity which are authorized by this permit may be combined with other sources of storm water which are not classified as associated with industrial activity pursuant to 40 CFR 122.26(b)(14), so long as the resulting discharge is in compliance with this permit.

D. Authorization.

1. Dischargers of storm water associated with industrial activity must submit a NOI in accordance with the requirements of Part II of this permit, using a NOI form provided by the Director, to be authorized to discharge under this general permit.
2. After the NOI form is reviewed by the Ohio EPA, the permittee shall be notified as to Ohio EPA's approval or denial for coverage under this general permit.
3. The Director may require submittal of an application for an individual NPDES permit based on a review of the NOI or other information.

Part II. NOTICE OF INTENT REQUIREMENTS

A. Deadlines for Notification.

1. Except as provided in paragraphs II.A.4, II.A.5 and II.A.6, individuals who intend to obtain coverage for a storm water discharge associated with industrial activity that was in existence prior to April 1, 1993, under this general permit should have submitted a Notice of Intent (NOI) in accordance with the requirements of this part on or before October 1, 1992;
2. Except as provided in paragraphs II.A.3, II.A.4, II.A.5, and II.A.6 operators of facilities which begin discharging storm water associated with industrial activity after April 1, 1993, shall submit a NOI in accordance with the requirements of this part at least 180 days prior to the commencement of storm water discharge associated with industrial activity at the facility;
3. Operators of oil and gas exploration, production, processing, or treatment operations or transmission facilities, that are not required to submit a permit application as of October 1, 1992 in accordance with 40 CFR 122.26(c)(1)(iii), but that after October 1, 1992 have a discharge of a reportable quantity of oil or a hazardous substance for which notification are required pursuant to either 40 CFR 110.6, 40 CFR 117.21 or 40 CFR 302.6, must submit a NOI in accordance with the requirements of Part II.C of this permit within 14 calendar days of the first knowledge of such release.
4. Storm water discharges associated with industrial activity from a facility that is owned or operated by a municipality that has participated in a timely Part 1 group application and where either the group application is rejected or facility is denied participation in the group application by U.S. EPA, and that are seeking coverage under this general permit shall submit a NOI in accordance with the requirements of this part on or before the 180th day following the date on which the group is rejected or the denial is made, or October 1, 1992, whichever is later.
5. Where the operator of a facility with a storm water discharge associated with industrial activity which is covered by this permit changes and the new operator wishes to have existing general permit coverage transferred, the new and current operators of the facility must submit letters requesting a

transfer of responsibility in accordance with the requirements of this part at least 60 days prior to the change.

6. An operator of a storm water discharge associated with industrial activity may submit a NOI in accordance with the requirements of this part after the dates provided in Parts II.A.1, 2, 3, or 4 of this permit. In such instances, Ohio EPA may bring an enforcement action for any discharges of storm water associated with industrial activity that have occurred on or after the dates specified in Part II.A.1, 2, 3 or 4.

- B. **Contents of Notice of Intent.** The applicant shall complete and submit an approved NOI form provided by Ohio EPA.

- C. **Where to Submit.** Facilities which discharge storm water associated with industrial activity must use a NOI form provided by the Director. NOIs must be signed in accordance with Part VII.G of this permit. NOIs are to be submitted to the Director at the following address:

Ohio Environmental Protection Agency
General Permit Program NOI
1800 Watermark Drive
P.O. Box 163669
Columbus, Ohio 43216-3669

- D. **Additional Notification.** Facilities which discharge storm water associated with industrial activity through a large or medium municipal separate storm sewer systems (systems located in an incorporated city with a population of 100,000 or more, or in a county identified as having a large or medium system (see definition in Part IX of this permit)) shall, in addition to filing copies of the Notice of Intent in accordance with paragraph II.D, also submit signed copies of the Notice of Intent to the operator of the municipal separate storm sewer through which they discharge in accordance with the deadlines in Part II.A of this permit.

- E. **Renotification.** Upon issuance of a new or alternate general permit, the permittee shall notify the Director of its intent to be covered by the new or alternate general permit in accordance with instructions provided by Ohio EPA's written instructions to renotify. Coverage under this permit shall terminate within 90 days of the date of Ohio EPA's written instructions to renotify.

- F. **Notice of Termination (NOT).** Where all storm water discharges associated with industrial activity that are authorized by this permit are eliminated, the operator of the facility must submit a NOT form provided by Ohio EPA that is signed in accordance with Part VII.G of this permit.

All Notices of Termination are to be sent, using the form provided by the Director (or a photocopy thereof), to the following address:

Ohio Environmental Protection Agency
General Permit Program NOT
1800 Watermark Drive
P.O. Box 163669
Columbus, Ohio 43216-3669

Part III. SPECIAL CONDITIONS

- A. **Prohibition on non-storm water discharges.**

1. Except as provided in paragraph III.A.2, all discharges covered by this permit shall be composed entirely of storm water.
2. a. Except as provided in paragraph III.A.2.b, discharges of material other than storm water must be in compliance with a NPDES permit (other than this permit) issued for the discharge.

- b. The following non-storm water discharges may be authorized by this permit provided the non-storm water component of the discharge is in compliance with paragraph IV.D.3.g: discharges from fire fighting activities; fire hydrant flushings; potable water sources including waterline flushings; irrigation drainage; lawn watering; routine external building washdown which does not use detergents; pavement washwaters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used; air conditioning condensate; springs; uncontaminated ground water; and foundation or footing drains where flows are not contaminated with process materials such as solvents.

B. Releases in excess of Reportable Quantities.

- 1. The discharge of hazardous substances or oil in the storm water discharge(s) from a facility shall be minimized in accordance with the applicable storm water pollution prevention plan for the facility. Except as provided in Part III.B.2 of this permit, where a release containing a hazardous substance in an amount equal to or in excess of a reportable quantity established under either 40 CFR 117 or 40 CFR 302, occurs during a 24 hour period:
 - a. Any person in charge of the facility is required to notify the National Response Center (NRC) (800-424-8802); in accordance with the requirements of 40 CFR 110, 40 CFR 117 and 40 CFR 302 as soon as he or she has knowledge of the discharge;
 - b. The permittee shall submit within 14 calendar days of knowledge of the release a written description of the release (including the type and estimate of the amount of material released), the date that such release occurred, the circumstances leading to the release, and steps to be taken in accordance with Part III.B.1.c. of this permit to the appropriate Ohio EPA District Office; and
 - c. The storm water pollution prevention plan required under Part IV of this permit must be modified within 14 calendar days of knowledge of the release to: provide a description of the release, the circumstances leading to the release, and the date of the release. In addition, the plan must be reviewed to identify measures to prevent the reoccurrence of such releases and to respond to such releases, and the plan must be modified where appropriate.
- 2. Multiple Anticipated Discharges - Facilities which have more than one anticipated discharge per year containing a hazardous substance in an amount equal to or in excess of a reportable quantity established under either 40 CFR 117 or 40 CFR 302, which occurs during a 24 hour period, where the discharge is caused by events occurring within the scope of the relevant operating system shall:
 - a. submit notifications in accordance with Part III.B.1 of this permit for the first such release that occurs during a calendar year (or for the first year of this permit, after submittal of an NOI); and
 - b. shall provide in the storm water pollution prevention plan required under Part IV a written description of the dates on which such releases occurred, the type and estimate of the amount of material released, and the circumstances leading to the release. In addition, the plan must be reviewed to identify measures to minimize such releases and the plan must be modified where appropriate.
- 3. Spills. This permit does not authorize the discharge of hazardous substances or oil resulting from an on-site spill.

Part IV. STORM WATER POLLUTION PREVENTION PLANS

A storm water pollution prevention plan (plan) shall be developed for each facility covered by this permit. Storm water pollution prevention plans shall be prepared in accordance with good engineering practices. The plan shall identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges associated with industrial activity from the facility. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit. Facilities must implement the provisions of the storm water pollution prevention plan required under this part as a condition of this permit.

A. Deadlines for Plan Preparation and Compliance.

1. Except as provided in paragraphs IV.A.3, 4 and 5 the plan for a storm water discharge associated with industrial activity that is existing on or before October 1, 1992, or that commences prior to April 1, 1993:
 - a. shall be prepared on or before April 1, 1993 (and updated as appropriate);
 - b. shall provide for initial implementation and compliance with the terms of the plan on or before October 1, 1993;
2. The plan for any storm water discharges associated with industrial activity that commences after April 1, 1993, shall be prepared, and except as provided elsewhere in this permit, shall provide for compliance with the terms of the plan and this permit within 180 days of a timely NOI (and updated as appropriate);
3. The plan for storm water discharges associated with industrial activity from an oil and gas exploration, production, processing, or treatment operation or transmission facility that is not required to submit a permit application as of October 1, 1992 in accordance with 40 CFR 122.26(c)(1)(iii), but after October 1, 1992 has a discharge of a reportable quantity of oil or a hazardous substance for which notification is required pursuant to either 40 CFR 110.6, 40 CFR 117.21 or 40 CFR 302.6, shall be prepared and except as provided elsewhere in this permit, shall provide for compliance with the terms of the plan and this permit on or before the date 60 calendar days after the first knowledge of such release (and updated as appropriate);
4. The plan for storm water discharges associated with industrial activity from any facility owned or operated by a municipality that has participated in a timely Part 1 group application and where either the group application is rejected or facility is denied participation in the group application by U.S.EPA,
 - a. shall be prepared on or before the 365th day following the date on which the group is rejected or the denial is made, or by April 1, 1993, whichever is later (and updated as appropriate).
 - b. except as provided elsewhere in this permit, shall provide for compliance with the terms of the plan and this permit on or before the 545th day following the date on which the group is rejected or the denial is made, or by October 1, 1993, whichever is later;
5. Upon a showing of good cause, the Director may establish a later date for preparing and compliance with a plan for a storm water discharge associated with industrial activity that submits a NOI in accordance with Part II.A.5 of this permit (and updated as appropriate).

B. Signature and Plan Review.

1. The plan shall be signed in accordance with Part VII.G, and be retained on-site at the facility which generates the storm water discharge.
2. The permittee shall make plans available upon request to the Ohio EPA Director, or authorized representative, or Regional Administrator of U.S.

EPA, or in the case of a storm water discharge associated with industrial activity which discharges through a municipal separate storm sewer system, to the operator of the municipal system.

3. The Director may notify the permittee at any time that the plan does not meet one or more of the minimum requirements of this Part. Within 30 days of such notification from the Director, the permittee shall make the required changes to the plan and shall submit to the Director a written certification that the requested changes have been made.
4. All storm water pollution prevention plans required under this permit are considered reports that shall be available to the public under Section 308(b) of the Act. The permittee may choose to fulfill such requests by allowing viewing of the plan at its facilities, or choosing to copy the plan and sending it to the party making the request. The permittee may charge the party making the request a reasonable fee for copying the plan. The permittee may claim any portion of a storm water pollution plan as confidential in accordance with 40 CFR Part 2 and does not have to release any portion of the plan describing facility security measures (such as provided for in Part IV.D.7.b.(8) of this permit).

C. Keeping Plans Current.

The permittee shall amend the plan whenever there is a change in design, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to the waters of the United States or if the storm water pollution prevention plan proves to be ineffective in eliminating or significantly minimizing pollutants from sources identified under Part IV.D.2 of this permit, or otherwise achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity. Amendments to the plan may be reviewed by Ohio EPA in the same manner as Part IV.B above.

D. Contents of Plan. The plan shall include, at a minimum, the following items:

1. Pollution Prevention Team - Each plan shall identify a specific individual or individuals within the facility organization as members of a storm water Pollution Prevention Team that are responsible for developing the storm water pollution prevention plan and assisting the facility or plant manager in its implementation, maintenance, and revision. The plan shall clearly identify the responsibilities of each team member. The activities and responsibilities of the team shall address all aspects of the facility's storm water pollution prevention plan.
2. Description of Potential Pollutant Sources. Each plan shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to storm water discharges or which may result in the discharge of pollutants during dry weather from separate storm sewers draining the facility. Each plan shall identify all activities and significant materials which may potentially be significant pollutant sources. Each plan shall include, at a minimum:

a. Drainage.

- (1) A site map indicating an outline of the drainage area of each storm water outfall, each existing structural control measure to reduce pollutants in storm water runoff, surface water bodies, locations where significant materials are exposed to precipitation, locations where major spills or leaks identified under Part IV.D.2.c of this permit have occurred, and the locations of the following activities where such activities are exposed to precipitation: fueling stations, vehicle and equipment maintenance and/or cleaning areas, loading/unloading areas,

locations used for the treatment, storage or disposal of wastes, liquid storage tanks, processing areas and storage areas.

- (2) For each area of the facility that generates storm water discharges associated with industrial activity with a reasonable potential for containing significant amounts of pollutants, a prediction of the direction of flow, and an estimate of the types of pollutants which are likely to be present in storm water discharges associated with industrial activity. Flows with a significant potential for causing erosion shall be identified.
 - b. **Inventory of Exposed Materials.** An inventory of the types of materials handled at the site that potentially may be exposed to precipitation. Such inventory shall include a narrative description of significant materials that have been handled, treated, stored or disposed in a manner to allow exposure to storm water between the time of three years prior to the date of the issuance of this permit and the present; method and location of on-site storage or disposal; materials management practices employed to minimize contact of materials with storm water runoff between the time of three years prior to the date of the issuance of this permit and the present; the location and a description of existing structural and non-structural control measures to reduce pollutants in storm water runoff; and a description of any treatment the storm water receives.
 - c. **Spills and Leaks.** A list of significant spills and significant leaks of toxic or hazardous pollutants that occurred at the facility after the date of three years prior to the effective date of this permit.
 - d. **Sampling Data.** A summary of existing discharge sampling data describing pollutants in storm water discharges from the facility.
 - e. **Risk Identification and Summary of Potential Pollutant Sources** A narrative description of the potential pollutant sources at the following areas: loading and unloading operations; outdoor storage activities; outdoor manufacturing or processing activities; significant dust or particulate generating processes; and on-site waste disposal practices. The description shall specifically list any significant potential source of pollutants at the site and for each potential source, any pollutant or pollutant parameter (e.g. biochemical oxygen demand, etc.) of concerns shall be identified.
3. **Measures and Controls.** Each facility covered by this permit shall develop a description of storm water management controls appropriate for the facility, and implement such controls. The appropriateness and priorities of controls in a plan shall reflect identified potential sources of pollutants at the facility. The description of storm water management controls shall address the following minimum components, including a schedule for implementing such controls:
 - a. **Good Housekeeping** - Good housekeeping requires the maintenance of a clean, orderly facility.
 - b. **Preventive Maintenance** - A preventive maintenance program shall involve inspection and maintenance of storm water management devices (e.g. cleaning oil/water separators, catch basins) as well as inspecting and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters, and ensuring appropriate maintenance of such equipment and systems.
 - c. **Spill Prevention and Response Procedures** - Areas where potential spills can occur, and their accompanying drainage points shall be identified clearly in the storm water pollution prevention plan. Where

appropriate, specifying material handling procedures, storage requirements, and use of equipment such as diversion valves in the plan should be considered. Procedures for cleaning up spills shall be identified in the plan and made available to the appropriate personnel. The necessary equipment to implement a clean up should be available to personnel.

- d. Inspections - In addition to or as part of the comprehensive site evaluation required under Part IV.4. of this permit, qualified facility personnel shall be identified to inspect designated equipment and areas of the facility at appropriate intervals specified in the plan. A set of tracking or follow-up procedures shall be used to ensure that appropriate actions are taken in response to the inspections. Records of inspections shall be maintained.
- e. Employee Training - Employee training programs shall inform personnel at all levels of responsibility of the components and goals of the storm water pollution prevention plan. Training should address topics such as spill response, good housekeeping and material management practices. The plan shall identify periodic dates for such training.
- f. Recordkeeping and Internal Reporting Procedures - A description of incidents such as spills, or other discharges, along with other information describing the quality and quantity of storm water discharges shall be included in the plan required under this part. Inspections and maintenance activities shall be documented and records of such activities shall be incorporated into the plan.
- g. Non-Storm Water Discharges
 - (1) The plan shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharges. The certification shall include the identification of potential significant sources of non-storm water at the site, a description of the results of any test and/or evaluation for the presence of non-storm water discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation, and the on-site drainage points that were directly observed during the test. Such certification may not be feasible if the facility operating the storm water discharge associated with industrial activity does not have access to an outfall, manhole, or other point of access to the ultimate conduit which receives the discharge. In such cases, the source identification section of the storm water pollution plan shall indicate why the certification required by this part was not feasible, along with the identification of potential significant sources of non-storm water at the site. A discharger that is unable to provide the certification required by this paragraph must notify in accordance with Part VI.A of this permit.
 - (2) Except for flows from fire fighting activities, sources of non-storm water listed in Part III.A.2 of this permit that are combined with storm water discharges associated with industrial activity must be identified in the plan. The plan shall identify and ensure the implementation of appropriate pollution prevention measures for the non-storm water component(s) of the discharge.
- h. Sediment and Erosion Control - The plan shall identify areas which, due to topography, activities, or other factors, have a high potential for significant soil erosion, and identify measures to limit erosion.
- i. Management of Runoff - The plan shall contain a narrative consideration of the appropriateness of traditional storm water management practices (practices other than those which control the source of pollutants)

used to divert, infiltrate, reuse, or otherwise manage storm water runoff in a manner that reduces pollutants in storm water discharges from the site. The plan shall provide that measures determined to be reasonable and appropriate shall be implemented and maintained. The potential of various sources at the facility to contribute pollutants to storm water discharges associated with industrial activity (see Parts IV.D.2.(b), (d) and (e) of this permit) shall be considered when determining reasonable and appropriate measures. Appropriate measures may include: including vegetative swales and practices, reuse of collected storm water (such as for a process or as an irrigation source), inlet controls (such as oil/water separators), snow management activities, infiltration devices, and wet detention/retention devices.

4. Comprehensive Site Compliance Evaluation. Qualified personnel shall conduct site compliance evaluations at appropriate intervals specified in the plan, but, except as provided in paragraph IV.D.4.d, in no case less than once a year. Such evaluations shall provide:
 - a. Material handling areas and other potential sources of pollution identified in the plan in accordance with paragraph IV.D.2 of this permit shall be visually inspected for evidence of, or the potential for, pollutants entering the drainage system. Structural storm water management measures, sediment and control measures, and other structural pollution prevention measures identified in the plan shall be observed to ensure that they are operating correctly. A visual inspection of equipment needed to implement the plan, such as spill response equipment, shall be made.
 - b. Based on the results of the inspection, the description of potential pollutant sources identified in the plan in accordance with paragraph IV.D.2 of this permit and pollution prevention measures and controls identified in the plan in accordance with paragraph IV.D.3 of this permit shall be revised as appropriate within two weeks of such inspection and shall provide for implementation of any changes to the plan in a timely manner, but in no case more than twelve weeks after the inspection.
 - c. A report summarizing the scope of the inspection, personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the storm water pollution prevention plan, and actions taken in accordance with paragraph IV.D.4.b of the permit shall be made and retained as part of the storm water pollution prevention plan for at least three years. The report shall be signed in accordance with Part VII.G of this permit.
 - d. Where annual site inspections are shown in the plan to be impractical for inactive mining sites due to the remote location and inaccessibility of the site, site inspections required under this part shall be conducted at appropriate intervals specified in the plan, but, in no case less than once in three years. At least one site inspection required under this part shall be conducted prior to October 1, 1994 or, for sites which become inactive after October 1, 1994, the date two years after such site becomes inactive.
5. Additional requirements for storm water discharges associated with industrial activity through municipal separate storm sewer systems serving a population of 100,000 or more.

In addition to the applicable requirements of this permit, facilities covered by this permit must comply with applicable requirements in municipal storm water management programs developed under NPDES permits issued for the discharge of the municipal separate storm sewer system that receives the facility's discharge, provided the discharger has been notified of such conditions.

6. Consistency with other plans. Storm water pollution prevention plans may reflect requirements for Spill Prevention Control and Countermeasure (SPCC) plans developed for the facility under section 311 of the Act or Best Management Practices (BMP) Programs otherwise required by a NPDES permit for the facility as long as such requirement is incorporated into the storm water pollution prevention plan.
7. Additional requirements for storm water discharges associated with industrial activity from facilities subject to SARA Title III, Section 313 requirements. In addition to the requirements of Parts IV.D.1 through 4 of this permit and other applicable conditions of this permit, storm water pollution prevention plans for facilities subject to reporting requirements under SARA Title III, Section 313 for chemicals which are classified as "Section 313 water priority chemicals" in accordance with the definition in Part IX of this permit, shall describe and ensure the implementation of practices which are necessary to provide for conformance with the following guidelines:
 - a. In areas where Section 313 water priority chemicals are stored, processed or otherwise handled, appropriate containment, drainage control and/or diversionary structures shall be provided. At a minimum, one of the following preventive systems or its equivalent shall be used:
 - (1) Curbing, culverting, gutters, sewers or other forms of drainage control to prevent or minimize the potential for storm water run-on to come into contact with significant sources of pollutants; or
 - (2) Roofs, covers or other forms of appropriate protection to prevent storage piles from exposure to storm water, and wind blowing.
 - b. In addition to the minimum standards listed under Part IV.D.7.a of this permit, the storm water pollution prevention plan shall include a complete discussion of measures taken to conform with the following applicable guidelines, other effective storm water pollution prevention procedures, and applicable State rules, regulations and guidelines:
 - (1) Liquid storage areas where storm water comes into contact with any equipment, tank, container, or other vessel used for Section 313 water priority chemicals.
 - (a) No tank or container shall be used for the storage of a Section 313 water priority chemical unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature, etc.
 - (b) Liquid storage areas for Section 313 water priority chemicals shall be operated to minimize discharges of Section 313 chemicals. Appropriate measures to minimize discharges of Section 313 chemicals may include secondary containment provided for at least the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation, a strong spill contingency and integrity testing plan, and/or other equivalent measures.
 - (2) Material storage areas for Section 313 water priority chemicals other than liquids. Material storage areas for Section 313 water priority chemicals other than liquids which are subject to runoff, leaching, or wind blowing shall incorporate drainage or other control features which will minimize the discharge of Section 313 water priority chemicals by reducing storm water contact with Section 313 water priority chemicals.
 - (3) Truck and rail car loading and unloading areas for liquid Section 313 water priority chemicals. Truck and rail car loading and

unloading areas for liquid Section 313 water priority chemicals shall be operated to minimize discharges of Section 313 water priority chemicals. Appropriate measures to minimize discharges of Section 313 chemicals may include: the placement and maintenance of drip pans where spillage may occur (such as hose connections, hose reels and filler nozzles) for use when making and breaking hose connections; a strong spill contingency and integrity testing plan; and/or other equivalent measures.

- (4) In facility areas where Section 313 water priority chemicals are transferred, processed or otherwise handled. Processing equipment and materials handling equipment shall be operated so as to minimize discharges of Section 313 water priority chemicals. Materials used in piping and equipment shall be compatible with the substances handled. Drainage from process and materials handling areas shall be designed as described in paragraphs (a), (b) and (c) of this section. Additional protection such as covers or guards to prevent wind blowing, spraying or releases from pressure relief vents from causing a discharge of Section 313 water priority chemicals to the drainage system, and overhangs or door skirts to enclose trailer ends at truck loading/unloading docks shall be provided as appropriate. Visual inspections or leak tests shall be provided for overhead piping conveying Section 313 water priority chemicals without secondary containment.
- (5) Discharges from areas covered by paragraphs (1), (2), (3) or (4).
 - (a) Drainage from areas covered by paragraphs (1), (2), (3) or (4) of this part should be restrained by valves or other positive means to prevent the discharge of a spill or other excessive leakage of Section 313 water priority chemicals. Where containment units are employed, such units may be emptied by pumps or ejectors; however, these shall be manually activated.
 - (b) Flapper-type drain valves shall not be used to drain containment areas. Valves used for the drainage of containment areas should, as far as is practical, be of manual, open-and-closed design.
 - (c) If facility drainage is not engineered as above, the final discharge of all in-facility storm sewers shall be equipped to be equivalent with a diversion system that could, in the event of an uncontrolled spill of Section 313 water priority chemicals, return the spilled material to the facility.
 - (d) Records shall be kept of the frequency and estimated volume (in gallons) of discharges from containment areas.
- (6) Facility site runoff other than from areas covered by (1), (2), (3) or (4). Other areas of the facility (those not addressed in paragraphs (1), (2), (3) or (4)), from which runoff which may contain Section 313 water priority chemicals or spills of Section 313 water priority chemicals could cause a discharge shall incorporate the necessary drainage or other control features to prevent discharge of spilled or improperly disposed material and ensure the mitigation of pollutants in runoff or leachate.
- (7) Preventive maintenance and housekeeping. All areas of the facility shall be inspected at specific intervals for leaks or conditions that could lead to discharges of Section 313 water priority chemicals or direct contact of storm water with raw materials, intermediate materials, waste materials or products. In particular, facility piping, pumps, storage tanks and bins,

pressure vessels, process and material handling equipment, and material bulk storage area shall be examined for any conditions or failures which could cause a discharge. Inspection shall include examination for leaks, wind blowing, corrosion, support or foundation failure, or other forms of deterioration or non-containment. Inspection intervals shall be specified in the plan and shall be based on design and operational experience. Different areas may require different inspection intervals. Where a leak or other condition is discovered which may result in significant releases of Section 313 water priority chemicals to the drainage system, corrective action shall be immediately taken or the unit or process shut down until corrective action can be taken. When a leak or non-containment of a Section 313 water priority chemical has occurred, contaminated soil, debris, or other material must be promptly removed and disposed in accordance with Federal, State, and local requirements and as described in the plan.

- (8) Facility security. Facilities shall have the necessary security systems to prevent accidental or intentional entry which could cause a discharge. Security systems described in the plan shall address fencing, lighting, vehicular traffic control, and securing of equipment and buildings.
 - (9) Training. Facility employees and contractor personnel using the facility shall be trained in and informed of preventive measures at the facility. Employee training shall be conducted at intervals specified in the plan, but not less than once per year, in matters of pollution control laws and regulations, and in the storm water pollution prevention plan and the particular features of the facility and its operation which are designed to minimize discharges of Section 313 water priority chemicals. The plan shall designate a person who is accountable for spill prevention at the facility and who will set up the necessary spill emergency procedures and reporting requirements so that spills and emergency releases of Section 313 water priority chemicals can be isolated and contained before a discharge of a Section 313 water priority chemical can occur. Contractor or temporary personnel shall be informed of facility operation and design features in order to prevent discharges or spills from occurring.
 - (10) Engineering Certification. No storm water pollution prevention plan for facilities subject to SARA Title III, Section 313 requirements for chemicals which are classified as 'Section 313 water priority chemicals' shall be effective to satisfy the requirements of part IV.D.7 of this permit unless it has been reviewed by a Registered Professional Engineer and certified to by such Professional Engineer. A Registered Professional Engineer shall recertify the plan every three years thereafter. By means of these certifications the engineer, having examined the facility and being familiar with the provisions of this part, shall attest that the storm water pollution prevention plan has been prepared in accordance with good engineering practices. Such certifications shall in no way relieve the owner or operator of a facility covered by the plan of their duty to prepare and fully implement such plan.
8. Additional Requirements for Salt Storage. Storage piles of salt used for deicing or other commercial or industrial purposes and which generate a storm water discharge associated with industrial activity which is discharged to a waters of the United States shall be enclosed or covered to prevent exposure to precipitation, except for exposure resulting from adding or removing materials from the pile within two years of the date of issuance

of this permit. Piles do not need to be enclosed or covered where storm water from the pile is not discharged to waters of the United States.

Part V. NUMERIC EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- A. Coal Pile Runoff Effluent Limitations.** Any discharge of coal pile runoff is authorized to discharge as of the effective date of this permit and shall comply with the following effluent limitations as expeditiously as practicable, but no later than October 26, 1995. Coal pile runoff shall not be diluted with storm water or other flow in order to meet these limitations.

<u>Units</u>	<u>Parameter</u>	<u>Daily Minimum</u>	<u>Daily Maximum</u>
mg/l	Total Suspended Solids	-	50
S.U.	pH	6.0	9.0

Any untreated overflow from facilities designed, constructed and operated to treat the volume of coal pile runoff which is associated with a 10 year, 24-hour rainfall event shall not be subject to the limitation for total suspended solids. It is the permittee's responsibility to demonstrate to the Ohio EPA that a 10 year, 24-hour rainfall event has occurred and the volume of the overflow to which the Total Suspended Solids effluent limitation does not apply.

- B. Monitoring Requirements.** Only the activities described in the following matrix (Page 15) and associated definitions are required to conduct monitoring. The monitoring required in the following matrix shall be conducted annually. Monitoring shall be initiated within twelve months of the date that the Director approves the entity for coverage under this general permit and henceforth on an annual basis, weather conditions permitting. A permittee may, in lieu of annual monitoring, certify that industrial materials are not exposed to storm water; such certification shall be submitted to the Ohio EPA upon request of the Director, except for Section 313 water priority chemical areas described in Part V.B.2.a.

1. a. Monitoring Requirements Matrix

Reporting Units	Parameter	INDUSTRIAL ACTIVITY CATEGORIES											
		a ¹	b ²	c	d	e	f	g	h	i ³	j	k	l ²
mg/l	Oil and Grease	X	X	X	X	X	X	X	X	X	X	X	X
mg/l	5-day Biochemical Oxygen Demand	X	X							X		X	
mg/l	Chemical Oxygen Demand	X	X	X	X	X	X		X	X			X
mg/l	Total Suspended Solids	X	X		X	X	X	X	X	X	X	X	X
mg/l	Total Kjeldahl Nitrogen	X		X								X	
mg/l	Phosphorus	X										X	
S.U.	pH	X	X	X	X	X	X	X	X	X	X	X	X
TU	Acute Toxicity	X	X ⁴	X	X	X							
Hours	Duration of Storm Event	X	X	X	X	X	X	X	X	X	X	X	X
Inches	Precipitation	X	X	X	X	X	X	X	X	X	X	X	X
Hours	Duration Between Storm Events*	X	X	X	X	X	X	X	X	X	X	X	X
Gallons	Volume (est)	X	X	X	X	X	X	X	X	X	X	X	X
mg/l	Nitrate-Nitrogen												
mg/l	Nitrite-Nitrogen												
µg/l	Lead, Total		X	X					X				
µg/l	Cadmium, Total		X ⁴	X									
µg/l	Copper, Total		X ⁴				X	X	X		X		
µg/l	Arsenic, Total		X ⁴	X			X						
µg/l	Chromium, Total		X ⁴	X			X						
mg/l	Ammonia												
µg/l	Magnesium, Total			X									
µg/l	Magnesium, Diss.			X									
mg/l	Total Dissolved Solids			X									
mg/l	Total Organic Carbon			X									
µg/l	Barium, Total			X									
mg/l	Cyanide, Total			X									
µg/l	Mercury, Total			X									
µg/l	Selenium, Total			X									
µg/l	Silver, Total			X									
µg/l	Pentachlorophenol				X								
µg/l	Nickel, Total							X			X		
µg/l	Zinc, Total							X			X		
#/100ml	Fecal Coliform											X	

*Time between the storm event when sampling is being conducted and the last storm event producing rainfall greater than 0.1 inches.

- 1 and any Section 313 water priority chemical for which the facility is subject to reporting requirements under Section 313 of the Emergency Planning and Community Right to Know Act of 1986.
- 2 and any pollutant limited in an effluent guideline or categorical pretreatment standard which the facility is subject.
- 3 and the primary ingredient used in the deicing materials used at the site (e.g., ethylene glycol, urea, etc.).
- 4 Facilities that are classified as SIC 33 only because they manufacture pure silicon and/or semiconductor grade silicon are not required to monitor for this parameter.

2. Industrial Activity Categories Definitions

- a. Section 313 of SARA Title III Facilities. In addition to any monitoring required by Parts V.B.2.b through 1., facilities with storm water discharges associated with industrial activity that are subject to requirements to report releases into the environment under Section 313 of SARA Title III for chemicals which are classified as 'Section 313 water priority chemicals' are required to monitor storm water that is discharged from the facility that comes into contact with any equipment, tank, container or other vessel or area used for storage of a Section 313 water priority chemical, or located at a truck or rail car loading or unloading area where a Section 313 water priority chemical is handled.
- b. Primary Metal Industries. Facilities with storm water discharges associated with industrial activity classified as Standard Industrial Classification (SIC) 33 (Primary Metal Industry) are required to monitor such storm water that is discharged from the facility.
- c. Land Disposal Units/Incinerators/BIFs. Facilities with storm water discharges associated with industrial activity from any active or inactive landfill, land application sites or open dump without a stabilized final cover that has received any industrial wastes from a facility with a Standard Industrial Classification (SIC) of between 20-39 (manufacturing); and incinerators (including Boilers and Industrial Furnaces (BIFs)) that burn hazardous waste and operate under interim status or a permit under Subtitle C of RCRA, are required to monitor such storm water that is discharged from the facility.
- d. Wood Treatment Using Chlorophenolic Formulations. Facilities with storm water discharges associated with industrial activity from areas that are used for wood treatment, wood surface application or storage of treated or surface protected wood at any wood preserving or wood surface facilities are required to monitor such storm water that is discharged from the facility.
- e. Wood Treatment Using Creosote Formulations. Facilities with storm water discharges associated with industrial activity from areas that are used for wood treatment, wood surface application or storage of treated or surface protected wood at any wood preserving or wood surface facilities are required to monitor such storm water that is discharged from the facility.
- f. Wood Treatment Using Chromium-Arsenic Formulations. Facilities with storm water discharges associated with industrial activity from areas that are used for wood treatment, wood surface application or storage of treated or surface protected wood at any wood preserving or wood surface facilities are required to monitor such storm water that is discharged from the facility.
- g. Coal Pile Runoff. Facilities with storm water discharges associated with industrial activity from coal pile runoff are required to monitor such storm water that is discharged from the facility.
- h. Battery Reclaimers. Facilities with storm water discharges associated with industrial activity from areas used for storage of lead acid batteries, reclamation products, or waste products, and areas used for lead acid battery reclamation (including material handling activities) at facilities that reclaim lead acid batteries are required to monitor such storm water that is discharged from the facility.
- i. Airports. At airports with over 50,000 flight operations per year, facilities with storm water discharges associated with industrial activity from areas where aircraft or airport deicing operations occur

(including runways, taxiways, ramps, and dedicated aircraft deicing stations) are required to monitor such storm water that is discharged from the facility.

- j. Coal-fired Steam Electric Facilities. Facilities with storm water discharges associated with industrial activity from coal handling sites at coal fired steam electric power generating facilities (other than discharges in whole or in part from coal piles subject to storm water effluent guidelines at 40 CFR 423 - which are not eligible for coverage under this permit) are required to monitor such storm water that is discharged from the facility.
- k. Animal Handling / Meat Packing. Facilities with storm water discharges associated with industrial activity from animal handling areas, manure management (or storage) areas, and production waste management (or storage) areas that are exposed to precipitation at meat packing plants, poultry packing plants, and facilities that manufacture animal and marine fats and oils, are required to monitor such storm water that is discharged from the facility.
- l. Additional Facilities. Facilities with storm water discharges associated with industrial activity that:
 - (1) come in contact with storage piles for solid chemicals used as raw materials that are exposed to precipitation at facilities classified as SIC 30 (Rubber and Miscellaneous Plastics Products) or SIC 28 (Chemicals and Allied Products);
 - (2) are from those areas at automobile junkyards with any of the following: (A) over 250 auto/truck bodies with drivelines (engine, transmission, axles, and wheels), 250 drivelines, or any combination thereof (in whole or in parts) are exposed to storm water; (B) over 500 auto/truck units (bodies with or without drivelines in whole or in parts) are stored exposed to storm water; or (C) over 100 units per year are dismantled and drainage or storage of automotive fluids occurs in areas exposed to storm water;
 - (3) come into contact with lime storage piles that are exposed to storm water at lime manufacturing facilities;
 - (4) are from oil handling sites at oil fired steam electric power generating facilities;
 - (5) are from cement manufacturing facilities and cement kilns (other than discharges in whole or in part from material storage piles subject to storm water effluent guidelines at 40 CFR 411 - which are not eligible for coverage under this permit);
 - (6) are from ready-mixed concrete facilities; or
 - (7) are from ship building and repairing facilities; are required to monitor such storm water discharged from the facility.
- 3. Sample Type. For discharges from holding ponds or other impoundments with a retention period greater than 24 hours, (estimated by dividing the volume of the detention pond by the estimated volume of water discharged during the 24 hours previous to the time that the sample is collected) a minimum of one grab sample may be taken. For all other discharges, data shall be reported for both a grab sample and a composite sample. All such samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. The

grab sample shall be taken during the first thirty minutes of the discharge. If the collection of a grab sample during the first thirty minutes is impracticable, a grab sample can be taken during the first hour of the discharge, and the discharger shall note with the monitoring report a description of why a grab sample during the first thirty minutes was impracticable. The composite sample shall either be flow-weighted or time-weighted. Composite samples may be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken in each hour of discharge for the entire discharge or for the first three hours of the discharge, with each aliquot being separated by a minimum period of fifteen minutes. Only grab samples must be collected and analyzed for the determination of pH, cyanide, whole effluent toxicity, and oil and grease.

4. **Sampling Waiver.** When a discharger is unable to collect samples due to adverse climatic conditions, the discharger must submit in lieu of sampling data a description of why samples could not be collected, including available documentation of the event. Adverse climatic conditions which may prohibit the collection of samples includes weather conditions that create dangerous conditions for personnel (such as local flooding, high winds, hurricane, tornadoes, electrical storms, etc.) or otherwise make the collection of a sample impracticable (drought, extended frozen conditions, etc.).
5. **Representative Discharge.** When a facility has two or more outfalls that, based on a consideration of features and activities within the area drained by the outfall, the permittee reasonably believes discharge substantially identical effluents, the permittee may test the effluent of one of such outfalls and report that the quantitative data also applies to the substantially identical outfalls. In addition, for each outfall that the permittee believes is representative, an estimate of the size of the drainage area (in square feet) and an estimate of the runoff coefficient of the drainage area (e.g. low (under 40%), medium (40% to 65%) or high (above 65%)) shall be provided.

- C. **Toxicity Testing.** Permittees that are required to monitor for acute whole effluent toxicity shall initiate the series of tests described below within 365 days of approval from the Director of coverage under this general permit. In lieu of toxicity testing, a facility may analyze its storm water for priority pollutants it knows or has reason to believe have the potential to discharge through an industrial outfall.

1. **Test Procedures**

The permittee shall conduct acute 24 hour static toxicity tests on both *Ceriodaphnia dubia* and fathead minnow (*Pimephales promelas*).

- a. All test organisms, procedures and quality assurance criteria used shall be in accordance with Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, EPA/600/4-90-027 (Rev. September 1991). EPA has proposed to establish regulations regarding these test methods (December 4, 1989, 53 FR 50216).
- b. Tests shall be conducted annually (once per year) on a grab sample of the discharge at 100% strength (no dilution) and a control consisting of either receiving water or synthetic dilution water. Results of all tests conducted with any species shall be reported according to EPA/600/4-90-027 (Rev. September 1991), Section 12, Report Preparation, and the report retained. The permittee shall report "0" if there is no statistical difference between the control mortality and the effluent mortality. If there is statistical difference (exhibits toxicity), the permittee shall report "1".

2. If acute whole effluent toxicity (statistically significant difference between the 100% dilution and the control) is detected in storm water discharges required to conduct on or after October 1, 1995, the permittee shall review the storm water pollution prevention plan and make appropriate modifications to assist in identifying the source(s) of toxicity and to reduce the toxicity of their storm water discharges. A summary of the review and the resulting modifications shall be provided in the plan.

Part VI. REPORTING REQUIREMENTS

- A. **Failure to Certify.** Any facility that is unable to make the certification required under paragraph IV.D.3.g.(1) (testing for non-storm water discharges), must note in its storm water pollution prevention plan its inability to make the certification by April 1, 1993 or, for facilities which begin to discharge storm water associated with industrial activity after October 1, 1992, within 180 days after submitting a NOI to be covered by this permit. Such notation shall describe: the procedure of any test conducted for the presence of non-storm water discharges; the results of such test or other relevant observations; potential sources of non-storm water discharges to the storm sewer; and why adequate tests for such storm sewers were not feasible.
- B. **Reporting: Where to Submit.**
 1. Permittees shall submit all monitoring data upon request of the Director or Regional Administrator.
 2. Signed copies of individual permit applications and all other reports required herein, shall be submitted to the Director of the Ohio EPA at the addresses previously given in this permit for NOIs and NOTs.
 3. **Additional Notification.** Facilities with at least one storm water discharge associated with industrial activity through a large or medium municipal separate storm sewer system (systems serving a population of 100,000 or more) in addition to submitting monitoring data in accordance with paragraph VI.B, must submit signed copies to the operator of the municipal separate storm sewer system at the same time they are submitted to the Ohio EPA.
- C. **Retention of Records.**
 1. The permittee shall retain the pollution prevention plan developed in accordance with Part IV of this permit for the life of the permit. The permittee shall retain all records of all monitoring information, copies of all reports required by this permit, and records of all data used to complete the Notice of Intent to be covered by this permit, for a period of at least six years from the date of the measurement, report, or application. This period may be explicitly modified by alternative provisions of this permit (see Part VI.C.2 of this permit) or extended by request of the Director at any time.
 2. For discharges subject to sampling requirements pursuant to Part V.B, in addition to the requirements of Part VI.C.1, permittees are required to retain for a six year period from the date of sample collection or for the term of this permit, which ever is greater, records of all monitoring information collected during the term of this permit. Permittees must submit such monitoring results to the Director upon the request of the Director.

Part VII. STANDARD PERMIT CONDITIONS

A. Duty to Comply.

1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

2. Penalties for Violations of Permit Conditions.

a. Criminal

- (1) ORC Chapter 6111 provides that any person who violates permit conditions is subject to a fine or by imprisonment.
- (2) False Statement. ORC Section 2921.13 provides that any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained or who knowingly falsifies, tampers with, or renders inaccurate, any monitoring device or method required to be maintained under the Act, shall upon conviction, be punished by a fine or by imprisonment for not more than 6 months, or both.

b. Civil Penalties - ORC Chapter 6111 provides that any person who violates a permit condition is subject to a civil penalty.

- B. Continuation of the Expired General Permit.** An expired general permit continues in force and effect until a new general permit is issued.
- C. Need to halt or reduce activity not a defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- D. Duty to Mitigate.** The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
- E. Duty to Provide Information.** The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine compliance with this permit. The permittee shall also furnish to the Director upon request copies of records required to be kept by this permit.
- F. Other Information.** When the permittee becomes aware that he or she failed to submit any relevant facts or submitted incorrect information in the Notice of Intent or in any other report to the Director, he or she shall promptly submit such facts or information.
- G. Signatory Requirements.** All Notices of Intent, Notices of Termination, storm water pollution prevention plans, reports, certifications or information either submitted to the Director (and/or the operator of a large or medium municipal separate storm sewer system), or that this permit requires be maintained by the permittee, shall be signed.

1. All Notices of Intent shall be signed as follows:

- a. For a corporation:** by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (1) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or (2) the manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25,000,000 (in second-quarter 1980 dollars) if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;
- b. For a partnership or sole proprietorship:** by a general partner or the proprietor, respectively; or
- c. For a municipality: State, Federal, or other public agency:** by either a principal executive officer or ranking elected official. For purposes

of this section, a principal executive officer of a Federal agency includes (1) the chief executive officer of the agency, or (2) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g. Regional Administrators of EPA).

2. All reports required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- a. The authorization is made in writing by a person described above and submitted to the Director.
- b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of manager, operator, superintendent, or position of equivalent responsibility or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position).
- c. Changes to authorization. If an authorization under paragraph VII.G.2. is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph VII.G.2. must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.
- d. Certification. Any person signing documents under this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- H. **Penalties for Falsification of Monitoring Systems.** ORC Chapter 6111 provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by fines and imprisonment.
- I. **Oil and Hazardous Substance Liability.** Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under section 311 of the Act.
- J. **Property Rights.** The issuance of this permit does not convey any property rights of any sort, nor any exclusive privileges, nor does it authorize any injury to private property nor any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.
- K. **Severability.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

- L. Transfers.** This permit is not transferable to any person except as described in Part II of this permit. The Director may require the operator to apply for and obtain an individual NPDES permit as stated in Part VII.M.
- M. Requiring an individual permit or an alternative general permit.**
1. The Director may require any person authorized by this permit to apply for and/or obtain either an individual NPDES permit or an alternative NPDES general permit. Any interested person may petition the Director to take action under this paragraph. The Director may require any owner or operator authorized to discharge under this permit to apply for an individual NPDES permit only if the owner or operator has been notified in writing that a permit application is required. This notice shall include a brief statement of the reasons for this decision, an application form, a statement setting a deadline for the owner or operator to file the application, and a statement that on the effective date of the individual NPDES permit or the alternative general permit as it applies to the individual permittee, coverage under this general permit shall automatically terminate. Individual permit applications shall be submitted to the address of the appropriate Ohio EPA district office. The Director may grant additional time to submit the application upon request of the applicant. If an owner or operator fails to submit in a timely manner an individual NPDES permit application as required by the Director, then the applicability of this permit to the individual NPDES permittee is automatically terminated at the end of the day specified for application submittal.
 2. Any owner or operator authorized by this permit may request to be excluded from the coverage of this permit by applying for an individual permit. The owner or operator shall submit an individual application (Form 1 and Form 2F) with reasons supporting the request to the Director. Individual permit applications shall be submitted to the appropriate Ohio EPA district office. The request may be granted by the issuance of any individual permit or an alternative general permit if the reasons cited by the owner or operator are adequate to support the request.
 3. When an individual NPDES permit is issued to an owner or operator otherwise subject to this permit, or the owner or operator is authorized for coverage under an alternative NPDES general permit, the applicability of this permit to the individual NPDES permittee is automatically terminated on the effective date of the individual permit or the date of authorization of coverage under the alternative general permit, whichever the case may be.
- N. Environmental Laws.** No condition of this permit shall release the permittee from any responsibility or requirements under other environmental statutes or regulations.
- O. Proper Operation and Maintenance.** The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit and with the requirements of storm water pollution prevention plans. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. Proper operation and maintenance requires the operation of backup or auxiliary facilities or similar systems, installed by a permittee only when necessary to achieve compliance with the conditions of the permit.
- P. Monitoring and records.**
1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
 2. The permittee shall retain records of all monitoring information including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of the reports required by this permit, and records of all data used to complete the

application for this permit, for a period of at least 6 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

3. **Records Contents.** Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;
- b. The initials or name(s) of the individual(s) who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. The time(s) analyses were initiated;
- e. The initials or name(s) of the individual(s) who performed the analyses;
- f. References and written procedures, when available, for the analytical techniques or methods used; and
- g. The results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine these results.

4. **Monitoring** must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.

Q. **Inspection and Entry.** The permittee shall allow the Director or an authorized representative of Ohio EPA or, in the case of a facility which discharges through a municipal separate storm sewer, an authorized representative of the municipal operator or the separate storm sewer receiving the discharge, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the permittee's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this permit;
2. Have access to and copy at reasonable times, any records that must be kept under the conditions of this permit; and
3. Inspect at reasonable times any facilities or equipment (including monitoring and control equipment).

R. **Permit Actions.** This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

S. **Upset.** The provisions of 40 CFR Section 122.41(n), relating to "Upset," are specifically incorporated herein by reference in their entirety. For definition of "upset," see Part IX. Definitions.

Part VIII. REOPENER CLAUSE

A. If there is evidence indicating potential or realized impacts on water quality due to any storm water discharge associated with industrial activity covered by this permit, the owner or operator of such discharge may be required to obtain individual permit or an alternative general permit in accordance with Part I.C of this permit or the permit may be modified to include different limitations and/or requirements.

B. Permit modification or revocation will be conducted according to 40 CFR 122.62, 122.63, 122.64 and 124.5.

Part IX. DEFINITIONS

"Act" means the Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972)

Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483, Pub. L. 97-117, and Pub. L. 100-4 33 U.S.C. 1251 et.seq.

"Best Management Practices" ("BMPs") means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States. BMPs also include treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

"Coal pile runoff" means the rainfall runoff from or through any coal storage pile

"Director" means the director of Ohio EPA or an authorized representative.

"Flow-weighted composite sample" means a composite sample consisting of a mixture of aliquots collected at a constant time interval, where the volume of each aliquot is proportional to the flow rate of the discharge.

"Landfill" means an area of land or an excavation in which wastes are placed for permanent disposal, and which is not a land application unit, surface impoundment, injection well, or waste pile.

"Land application unit" means an area where wastes are applied onto or incorporated into the soil surface (excluding manure spreading operations) for treatment or disposal.

"Large and Medium municipal separate storm sewer system" means all municipal separate storm sewers that are either:
(i) located in an incorporated place (city) with a population of 100,000 or more as determined by the latest Decennial Census by the Bureau of Census (these cities are listed in Appendices F and G of 40 CFR Part 122); or
(ii) located in the counties with unincorporated urbanized populations of 100,000 or more, except municipal separate storm sewers that are located in the incorporated places, townships or towns within such counties (these counties are listed in Appendices H and I of 40 CFR Part 122); or
(iii) owned or operated by a municipality other than those described in paragraph (i) or (ii) and that are designated by the Director as part of the large or medium municipal separate storm sewer system.

"National Pollutant Discharge Elimination System (NPDES)" means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the CWA. The term includes an "approved program".

"NOI" means notice of intent to be covered by this permit (see Part II of this permit).

"NOT" means notice of termination (see Part II.F. of this permit).

"Point Source" means any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharges. This term does not include return flows from irrigated agriculture or agricultural storm water runoff.

"Section 313 water priority chemical" means a chemical or chemical categories which are: 1) are listed at 40 CFR 372.65 pursuant to Section 313 of Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986, also titled the Emergency Planning and Community Right-to-Know Act of 1986; 2) are present at or above threshold levels at a facility subject to SARA Title III, Section 313 reporting requirements; and 3) that meet at least one of the following criteria: (i) are listed in Appendix D of 40 CFR 122 on either Table II (organic priority pollutants), Table III (certain metals, cyanides, and phenols) or Table V (certain

toxic pollutants and hazardous substances); (ii) are listed as a hazardous substance pursuant to section 311(b)(2)(A) of the Act at 40 CFR 116.4; or (iii) are pollutants for which EPA has published acute or chronic water quality criteria.

"Significant materials" includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under section 101(14) of CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

"Significant spills" includes, but is not limited to: releases of oil or hazardous substances in excess of reportable quantities under section 311 of the Clean Water Act (see 40 CFR 110.10 and CFR 117.21) or section 102 of CERCLA (see 40 CFR 302.4).

"Storm Water" means storm water runoff, snow melt runoff, and surface runoff and drainage.

"Storm Water Associated with Industrial Activity" means the discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program. For the categories of industries identified in subparagraphs (i) through (x) of this subsection, the term includes, but is not limited to, storm water discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at 40 CFR 401); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and finished products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water. For the categories of industries identified in subparagraph (xi), the term includes only storm water discharges from all areas listed in the previous sentence (except access roads) where material handling equipment or activities, "Storm Water Associated with Industrial Activity (Continued)" raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water. For the purposes of this paragraph, material handling activities include the: storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, finished product, by-product or waste product. The term excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas. Industrial facilities (including industrial facilities that are Federally or municipally owned or operated that meet the description of the facilities listed in this paragraph (i)-(xi)) include those facilities designated under 122.26(a)(1)(v). The following categories of facilities are considered to be engaging in "industrial activity" for purposes of this subsection:

- (i) Facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards under 40 CFR Subchapter N (except facilities with toxic pollutant effluent standards which are exempted under category (xi) of this paragraph);
- (ii) Facilities classified as Standard Industrial Classifications 24 (except 2434), 26 (except 265 and 267), 28 (except 283 and 285) 29, 311, 32 (except 323), 33, 3441, 373;

- (iii) Facilities classified as Standard Industrial Classifications 10 through 14 (mineral industry) including active or inactive mining operations (except for areas of coal mining operations meeting the definition of a reclamation area under 40 CFR 434.11(1)) and oil and gas exploration, production, processing, or treatment operations, or transmission facilities that discharge storm water contaminated by contact with or that has come into contact with, any overburden, raw material, intermediate products, finished products, byproducts or waste products located on the site of such operations; inactive mining operations are mining sites that are not being actively mined, but which have an identifiable owner/operator;
- (iv) Hazardous waste treatment, storage, or disposal facilities, including those that are operating under interim status or a permit under Subtitle C of RCRA;
- (v) Landfills, land application sites, and open dumps that have received any industrial wastes (waste that is received from any of the facilities described under this subsection) including those that are subject to regulation under Subtitle D of RCRA;
- (vi) Facilities involved in the recycling of materials, including metal scrapyards, battery reclaimers, salvage yards, and automobile junkyards, including but not limited to those classified as Standard Industrial Classification 5015 and 5093;
- (vii) Steam electric power generating facilities, including coal handling sites;
- (viii) Transportation facilities classified as Standard Industrial Classifications 40, 41, 42 (except 4221-25), 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, airport deicing operations, or which are otherwise identified under paragraphs (i)-(vii) or (ix)-(xi) of this subsection are associated with industrial activity;
- (ix) Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of 1.0 mgd or more, or required to have an approved pretreatment program under 40 CFR 403. Not included are farm lands, domestic gardens or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with 40 CFR 503;
- (x) Construction activity - This category of industrial activity is not regulated under this permit.
- (xi) Facilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 34 (except 3441), 35, 36, 37 (except 373), 38, 39, 4221-25, (and which are not otherwise included within categories (ii)-(x)).

"SWPPP" means storm water pollution prevention plan to be completed as a condition of this permit (see Part IV of this permit).

"Time-weighted composite" means a composite sample consisting of a mixture of equal volume aliquots collected at a constant time interval.

"Waste pile" means any non-containerized accumulation of solid, non-flowing waste that is used for treatment or storage.

"Waters of the United States" means:

- (a) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- (b) All interstate waters, including interstate "wetlands";
- (c) All other waters such as interstate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:
 - (1) Which are or could be used by interstate or foreign travelers for recreational or other purposes;
 - (2) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
 - (3) Which are used or could be used for industrial purposes by industries in interstate commerce;
- (d) All impoundments of waters otherwise defined as waters of the United States under this definition;
- (e) Tributaries of waters identified in paragraphs (a) through (d) of this definition;
- (f) The territorial sea; and
- (g) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) through (f) of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the CWA are not waters of the United States.

"10-year, 24-hour precipitation event" means the maximum 24-hour precipitation event with a probable reoccurrence interval of once in 10 years. This information is available in "Weather Bureau Technical Paper No. 40," May 1961 and "NOAA Atlas 2," 1973 for the 11 Western States; and may be obtained from the National Climatic Center of the Environmental Data Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce.

"Bypass" means the intentional diversion of waste streams from any portion of the treatment facility.

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

INTER-OFFICE COMMUNICATION

TO: Virginia Wilson, Environmental Specialist, DSIWM-NEDO

FROM: Kathy Metropulos, Hydrogeologist, DDAGW-NEDO, through Chris Khourey, Unit Supervisor, DDAGW-NEDO

SUBJECT: Ramsdell Landfill, July 3, 1994, Ground Water Sampling Event, Portage County

JOB NO: 1044

DATE: October 25, 1994

INTRODUCTION

The Division of Solid and Infectious Waste Management (DSIWM) has requested the Division of Drinking and Ground Waters (DDAGW) to review data for a ground water sampling event. The specific dates of the sampling event are not clear. It appears as though the sampling event was conducted near the end of July 1994. The data is contained in a letter dated September 21, 1994, from W. B. Talmon, Jr. to John Watkins. The letter was received by NEDO on September 27, 1994.

COMMENTS

1. Chain-of-custody forms should accompany each sampling event. The facility should submit these to the Ohio EPA.
2. OAC Rule 3745-27-10 (D)(7) requires all ground water analysis and statistical analysis results to be submitted to the Ohio EPA not later than 60 days after sampling or 15 days after receiving the analysis results. No statistical results were received by the Ohio EPA. The facility must submit the statistical results for this sampling event to the Ohio EPA.
3. OAC Rule 3745-27-10 (C)(2) requires the direction of ground water flow be determined each time ground water elevations are performed. The facility must submit this information to the Ohio EPA.

CONCLUSION

The above comments must be addressed.

KM:bo

cc: Lindsay Taliaferro, Supervisor, DDAGW-CO
John Watkins, Group Leader, DSIWM-NEDO



State of Ohio Environmental Protection Agency

Northeast District Office

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

George V. Voinovich
Governor

November 16, 1994

RE: SOLID WASTE
PORTAGE COUNTY
RAMSDELL LANDFILL
RAVENNA ARSENAL

W.B. Talmon, Jr., Site Manager
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, Ohio 44266-9297

Dear Mr. Talmon:

The Division of Drinking and Ground Waters has reviewed the July 3, 1994 groundwater monitoring data for the Ramsdell Landfill, a.k.a. Ravenna Army Ammunition Plant Landfill, located in Portage County. The review is in the form of an IOC to Virginia Wilson from Kathy Metropulos through Chris Khourey. Please note all of the comments contained within the IOC and incorporate them in future ground water data submittals. In reference to comment #2, the Grit/Stat program is presently inoperable at NEDO, so we respectfully request that a summary of the results be submitted in the form of table until we get the program operating.

If you have any questions, feel free to contact Kathy or me at 963-1200.

Sincerely,

Virginia Wilson
Division of Solid and
Infectious Waste Management

VW:c1

enclosure

cc: Chip Porter, Portage Co. HD
Scott Hester, DSIWM, CO



661 ANDERSEN DRIVE PITTSBURGH, PENNSYLVANIA 15220-2745 (412) 921-7090

January 4, 1994

Mr. W.B. Talmon, Jr.
Site Manager
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, Ohio 44266-9297

Subject: Response to Ohio EPA Notice of Deficiency Regarding the Part B Permit Application for the Ravenna Army Ammunition Plant Open Burning/Open Detonation Grounds
Halliburton NUS Proposal No. P94010001

Dear Mr. Talmon:

Halliburton NUS is pleased to submit this technical proposal in response to your letter of December 21, 1993, regarding the Ohio Environmental Protection Agency (OEPA) Notice of Deficiencies (NOD) regarding the Part B Permit Application for the Ravenna Army Ammunition Plant (RVAAP) Open Burning (OB)/Open Detonation (OD) grounds. The business proposal is being submitted separately. The technical and business proposals are based on our review of the OEPA NOD, telephone conversations with yourself, and our experience in Part B permitting for storage, OB, and OD units at numerous other facilities.

TECHNICAL UNDERSTANDING

RVAAP has submitted a Part B permit application to U.S. EPA and OEPA for the hazardous waste storage facility located in 1601 and for the OB and OD units used to thermally treat reactive wastes. OEPA has prepared a series of Notices of Deficiency on the application. RVAAP has prepared responses and revised the application accordingly. Halliburton NUS assisted RVAAP in the latest series of NOD responses submitted to OEPA in June and September 1992. In particular, Halliburton NUS completely developed the air, surface, and subsurface pathway assessments and prepared a groundwater detection monitoring program for the OB and OD units. This detection monitoring program was based on activities and wells installed by the AEHA during the geohydrologic study conducted during April and May 1992. As directed by RVAAP, Halliburton NUS did not modify the program. Halliburton NUS also prepared responses to many other NODs and associated application revisions. Halliburton NUS also was responsible for retyping the entire application incorporating changes prepared by RVAAP.

OEPA has prepared a series of NODs on the application. These NODs covered the following areas.

- General comments on typographical errors and facility status.
- Location information including requests for more legible maps.
- Waste characterization information.
- Request for a glossary of terms and chemical abbreviations.
- Additional information on hazardous waste container management.

Mr. W.B. Talmon, Jr.
Ravenna Army Ammunition Plant
Halliburton NUS Proposal No. P94010001
January 4, 1994 - Page 2

- Additional descriptions of OB and OD operating practices.
- Additional information on chemical constituents emitted during treatment by OB or OD.
- Submission of interim status groundwater monitoring data.
- Statistical analysis of interim status groundwater monitoring data.
- Identify and discuss all items in OEPA regulations related to groundwater monitoring.
- Sampling and analysis information.
- Additional information on the AEHA geohydrological study.
- Procedures to prevent hazards.
- Movement of OD area to OB area.
- Placement of a concrete pad under the burn pans.
- Additional information in the contingency plan.
- Clarification of training information.
- Additional information in the closure plan.

Halliburton NUS understands that the mission and number of personnel at RVAAP have been significantly decreased. These changes are likely to have affected the accuracy of operational information contained in the application. For example, emergency procedures, access control, emergency coordinators, security procedures, training practices, and other operating practices may have changed. OEPA has not specifically requested that RVAAP revise the application to reflect changes in operating procedures. However, Halliburton NUS recommends that appropriate revisions be made in the application at this time. The sections of the application that would be affected (D, F, G, H, Part A), must already be revised somewhat to respond to the comments from OEPA. The OEPA NOD states that both OEPA and U.S. EPA Region 5 are reviewing the air pathway assessment and that additional NODs will be sent on the air assessment. Halliburton NUS also prepared the surface and subsurface pathways assessments for the application. OEPA has not mentioned or provided any comments on these assessments. Based on experience with other permit applications for OB and OD units in U.S. EPA Region 5, Halliburton NUS believes that they will also review and provide comments on the surface and subsurface pathway assessments. However, the scope of work required to respond to any agency comments on the pathway assessments cannot be determined at this time.

Halliburton NUS recommends that a meeting be held with OEPA prior to revision of the application in response to these comments. OEPA has already identified two issues in NOD 44 which they wish to discuss in a meeting. These issues are the relocation of the OD area and the provision of concrete aprons under the burn pans. Halliburton NUS believes that a meeting should be held with the agency to discuss each of the NODs and the approach to providing the response and revising the application. It has been our experience that such meetings result in a more efficient and complete response to agency concerns. Ideally, this meeting should be held at RVAAP and be attended by OEPA permitting staff who prepared the comments and who can give preliminary approval to the proposed response approaches. A site tour should be part of the meeting.

SCOPE OF WORK

The scope of work has been organized into a series of sequential tasks based upon our technical understanding as described above and our experience in responding to similar NODs at other Department of Defense (DOD) facilities.

Task One - Project Initiation Meeting with RVAAP

In this task, the Halliburton NUS project manager and the permitting technical lead will meet with RVAAP staff at Ravenna. The agenda for this meeting will be as follows:

- Review each NOD and the proposed response approach.
- Identify information requirements.
- Identify application revisions required as a result of the change in status of RVAAP.
- Identify issues to be discussed with OEPA.
- Develop positions in regards to movement of the OD area and placement of concrete pads under the burn pans.
- Develop positions on any other issues identified during the review of the proposed responses and the change in operational status. These may include the frequency of groundwater monitoring at the OB and OD areas, schedule for preparation of responses, etc.
- Closure requirements if RVAAP withdraws the application.
- Appropriate response to NODs on the AEHA study.
- Need for risk assessments for the OB/OD facilities.

Halliburton NUS will be prepared to discuss each of these agenda items as well as others that may be identified while preparing for this meeting. This meeting will take place over a period of no more than one day.

Task Two - Meeting with OEPA

In this task, Halliburton NUS and RVAAP will meet with OEPA prior to the initiation of work on the responses. The agenda for this meeting would be as follows:

- Review each NOD and the proposed response.
- Discuss critical issues identified in Task 1 including movement of the OD area, concrete pads under the burn pans, frequency of groundwater monitoring, changes as a result of the operational status change, etc.
- Schedule for providing responses.

Mr. W.B. Talmon, Jr.
Ravenna Army Ammunition Plant
Halliburton NUS Proposal No. P94010001
January 4, 1994 - Page 4

- Tour of the storage and the OB and OD areas.
- Response to comments on the AEHA study.
- Risk assessment issues.

This meeting should take place at RVAAP if it is to include a site tour. If not, it can take place at the OEPA location most convenient to enable all of the agency permitting staff involved in review of the application to participate in the meeting. If OEPA has used contractors to review the application and prepare the comments, the agency should be asked to have them attend if they will review the responses and revised application.

The Halliburton NUS project manager and the Part B technical lead will attend the meeting. It is assumed that this meeting will take no more than one day and that it will take place at Ravenna or Twinsburg.

Task Three - Preparation of NOD Responses and Application Revisions

In this task, Halliburton NUS will prepare two documents. The first will be a specific response to each of the 78 NODs. The response will consist of a short narrative of how the application was revised including references to sections, tables, figures, drawings, etc., that will be revised, deleted, or added to the application. Explanations for the response will be provided as necessary. If the application is not revised or if the NOD is considered inappropriate, explanations will also be provided. The second document will be a revised permit application. The revised application will consist either of revised pages and/or sections to be inserted into the 1992 version of the application or a completely new application text. Whether the application will be resubmitted in whole or in part will be determined by the extent of the revisions, mainly the number of pages changed. It is assumed that most of the appendices will not require revision.

Following is a discussion of how Halliburton NUS proposes to prepare these documents organized according to the subject area of the NODs.

General Comments on Typographical Errors and Facility Status Changes

Typographical errors will be corrected, and the pinkwater units will be excluded from the application if permanently closed. (NOD 1, 2, 3)

Location Information

Figures B-5, B-6, and B-7 will be redrawn to be legible. The location of the OB/OD units in regard to the floodplain will be clarified. Street names will be added to Figure B-2. (NODs 4, 5, 6, 7)

Waste Characterization

The additional information requested on waste compositions and the rationales for sampling frequencies, analytes, and sampling methodologies will be provided. Information regarding procedures for characterizing wastes received from off site will be provided. (NODs 8, 9, 10, 11, 12, 13)

Glossary

A glossary of terms and chemical abbreviations used in the application will be developed and made part of the application. (NODs 8, 23)

Container Management

Additional information in regard to management of containers, particularly those containing liquids, will be provided. (NODs 14, 15, 16, 17)

OB and OD Operating Practices

A simple drawing of the burn pan without the drain will be prepared. Leak detection and inspection requirements will be revised to prevent ash from remaining around burn pans after burns. A copy of the U.S. Army study on the efficiency of open and open detonation will be provided. Alternative disposal methods for any accumulated water from burn pans will be developed. (NODs 18, 19, 20, 21, 22)

Chemical Constituents Emitted

Waste characterization data will be reviewed to assure that all major chemical constituents have been considered. Table E-2-2 will be revised to include the most current version of values in IRIS. This table will be revised to include only those constituents that are present in or may be formed during OB/OD treatment. (NOD 23) Halliburton NUS wishes to note that this table and Section E-2 may require further revision in the future when OEPA comments on the pathway assessments.

Interim Status Groundwater Monitoring Data

RVAAP has conducted several rounds of interim status groundwater monitoring at the OB and OD grounds. This data will be obtained from RVAAP, summarized into tables, and statistically analyzed. The evaluation of the results will be placed into the application. (NOD 25)

Information Requirements from OEPA Regulations for Groundwater Monitoring

OEPA hazardous waste regulations contain very detailed requirements for information to be presented in permit applications. Several NODs relate to additional information to show that all the elements of OEPA regulations were at least considered. The last permit application contained only the information provided in the AEHA report. Halliburton NUS will revise existing Section E-4 to address OEPA regulations as stated in the relevant NODs. (NODs 26, 27, 28, 29, 30, 31)

AEHA Geohydrological Study

AEHA installed groundwater monitoring wells and obtained soil and groundwater samples at the OB/OD grounds. The sampling and analysis activities had been approved by OEPA. Data obtained from this study were used in conducting the surface and subsurface pathway assessments and the fugitive dust portion of the air pathway assessment. The AEHA prepared a report summarizing the field activities and describing the results. This report was appended to the application as Appendix E-5. Several of the OEPA NODs relate to information presented in the report. Certain clarifications and changes to information presented

Mr. W.B. Talmon, Jr.
Ravenna Army Ammunition Plant
Halliburton NUS Proposal No. P94010001
January 4, 1994 - Page 6

in the application are requested. The requested information and clarifications will be made by Halliburton NUS in responses to the NODs and in Sections E-2, E-4, E-5, and E-6. It is assumed that a formal risk assessment will not be required for the OB/OD facilities. (NODs 32, 33, 34, 35, 36, 37, 38, 39, 40)

Procedures To Prevent Hazards

Additional information regarding inspections, emergency equipment, and runoff/runoff controls will be included. Relevant portions of AMC-385-100 safety requirements will be appended to Section F. The container storage building will be included in the discussion on precautions to prevent ignition or reaction of ignitable or reactive wastes. (NODs 41, 42, 43, 44, 45, 46) Halliburton NUS wishes to note that additional revisions may be required as a result of the changes in operational and personnel status.

Contingency Planning

OEPA has specifically requested that hazardous waste generating activities be updated to reflect any activities that have been closed or shut down. Additional information and clarifications are requested in various areas including emergency notification, identification of hazardous materials, and control procedures. Various modifications to figures will be made to include additional buildings and/or make drawings more legible. These include drawings G-4, G-5, and G-6. (NODs 47, 48, 49, 50, 51, 52, 53) Halliburton NUS wishes to note that additional changes may be required as a result of operational and personnel changes.

Personnel Training

Additional information and clarifications regarding the training program and personnel to be trained are to be incorporated into the application. (NODs 54, 55, 56, 57, 58, 59) Halliburton NUS wishes to note that the training program is likely to require revisions as a result of the recent changes in operational and personnel status.

Closure Plan

The closure plan will be made a stand-alone document. All references to other sections of the permit application will be deleted, and the referenced information incorporated into the closure plan. Additional descriptive information regarding less than 90 day storage units will be incorporated. Separate closure schedules will be provided for the OB and OD areas, and revisions will be made to the schedules to incorporate additional closure activities such as confirmation sampling. Additional detailed information of closure and decontamination techniques for the three facilities will be developed and incorporated into the closure plan. (NODs 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78). Halliburton NUS wishes to note that all closure plans, including the one to be revised in the application, must be revised again and resubmitted to OEPA prior to being implemented. That revision would contain even more detailed information. If RVAAP were to withdraw the application for any or all of the hazardous waste units, the closure plan will have to be resubmitted with much additional detail. Once approved by OEPA, the plan must be implemented.

Mr. W.B. Talmon, Jr.
Ravenna Army Ammunition Plant
Halliburton NUS Proposal No. P94010001
January 4, 1994 - Page 7

Task Four - Review Meeting with RVAAP

In this task, the Halliburton NUS project manager and the permitting technical lead will meet with RVAAP to review the draft NOD responses and revised application. It is assumed that the review can be completed in one day and that all RVAAP comments will be received at this meeting.

Task Five - Preparation of Final Responses and Application

In this task, Halliburton NUS will prepare the final responses and revised portions of the application. It is assumed that eight copies of the NOD responses and revised application will be required.

PROJECT PERSONNEL

Mr. Kim Turnbull will serve as the project manager. He has extensive experience in writing RCRA Part B permit applications including those for storage, open burning, and open detonation facilities. He has experience in dealing with regulatory agencies, tracking project costs, and providing clients with project progress. Mr. Turnbull will participate in meetings with RVAAP and OEPA. He will be responsible for all project activities, including directing the work of Halliburton NUS personnel in technical and non-technical disciplines.

Mr. Ralph Basinski will assist Mr. Turnbull and provide overall technical direction for project activities. He is experienced in RCRA Part B permitting. Mr. Basinski is responsible for the technical content of all Part B permitting projects conducted at the Halliburton NUS Pittsburgh office. He has provided technical direction for numerous Part B projects including ten Part B applications for OB and OD units. Mr. Basinski will participate in meetings with RVAAP and OEPA and approve all project deliverables.

SCHEDULE

The schedule for completion of activities described in the Scope-of-Work assumes that OEPA will agree to a meeting that would take place prior to preparation of the responses and revision of the application.

Task One

This task will be completed within fourteen days after authorization to proceed is formally received.

Task Two

This task will be completed within twenty one days. Halliburton NUS assumes that the meeting with OEPA described in this task take place immediately after the meeting with RVAAP described in Task One.

Task Three

This task will be completed within forty-two days after the meeting with OEPA or within forty-two days of the meeting with RVAAP if OEPA is not able to meet with RVAAP and Halliburton NUS.

Mr. W.B. Talmon, Jr.
Ravenna Army Ammunition Plant
Halliburton NUS Proposal No. P94010001
January 4, 1994 - Page 8

Task Four

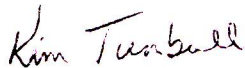
This task will be completed within seven days after delivery of the draft NOD responses and revised application to RVAAP.

Task Five

This task will be completed within fourteen days after the review meeting with RVAAP.

Halliburton NUS appreciates the opportunity to respond to your request for a proposal. If you have any questions regarding this technical proposal, please contact Mr. Kim Turnbull at 412-921-8945.

SUBMITTED BY:



Kim Turnbull
Project Manager

APPROVED FOR SUBMISSION BY:



John A. Dziubek, P.E.
General Manager, Pittsburgh Office



661 ANDERSEN DRIVE • PITTSBURGH, PENNSYLVANIA 15220 (412) 921-7090

C-49-01-4-016

January 5, 1994

Mr. W. B. Talmon, Jr.
Site Manager
Mason & Hanger - Silas Mason Company, Inc.
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, Ohio 44266-9297

Subject: Ohio EPA Notice of Deficiency Regarding the Part B
Permit Application for RVAAP's OB/OD Grounds

Dear Mr. Talmon:

As requested by your letter of December 21, 1993, attached is the Halliburton NUS Corporation fixed priced proposal for the preparation of the installations reply to the Notice of Deficiency (NOD).

A breakdown of the fixed price is also provided for your review. Halliburton NUS is audited on a regular basis by the Defense Contract Audit Agency and the burden rates (direct overhead and G&A) are our current provisional rates for proposal purposes. The labor rates are current average rates for the labor grades proposed.

This proposal is subject to the negotiation of mutually acceptable terms and conditions for a subcontract. If Mason & Hanger - Silas Mason Company, Inc. has a standard format, please forward a copy to me for review. If you prefer we can prepare a subcontract to cover the proposed services.

If there are any questions, or if you require additional information, please contact me at (412) 921-8389.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward G. Burtell, Jr.", is written over the typed name.

Edward G. Burtell, Jr.
Senior Contracts Administrator

EGB/sal

Attachment

cc: R. Basinski

ATTACHMENT A
LABOR BREAKDOWN

	Grade Category	14	13	12	11	9	8	7	5
	Discipline	SC	PTL	SG EE AS	ES	JG PS	EE CH	DR TE	CL
T-1	Project Initiation Meeting		16		16				4
T-2	OEPA Meeting		16		16				4
T-3	Preparation of NOD Response and Revised Application	12	40	24	80		184	32	48
T-4	Review Meeting with RVAAP		10	10					1
T-5	Final Response Application		16	8	32	4	8	12	32
TOTAL		12	98	42	144	4	192	44	99

AS = Air Scientist
CH = Chemist
CL = Clerical
DR = Drafting

EE = Environmental Engineer
JG = Junior Geologist
PS = Permitting Specialist

PTL = Permitting Technical Lead
SC = Senior Consultant
TE = Technical Editor

635 mhrs.

ATTACHMENT B

PRICE BREAKDOWN

Labor		
Grade 14	12 hours at \$41.63	\$499.56
Grade 13	98 hours at \$35.43	3,472.14
Grade 12	42 hours at \$32.47	1,363.74
Grade 11	144 hours at \$26.78	3,856.32
Grade 9	4 hours at \$21.40	85.60
Grade 8	192 hours at 18.20	3,494.40
Grade 7	44 hours at 16.24	714.56
Grade 5	99 hours at \$11.88	1,176.12
Total	635	\$14,662.44
Direct Overhead 104.55%		\$15,329.58
TOTAL LABOR		\$29,992.02
Other Direct Costs		
Travel: Airfare	Pittsburgh, PA to Columbus, OH Roundtrip 2 at \$610.00 each	\$1,220.00
Car Rental		120.76
Gas for Rental Car		28.00
Lodging		320.00
Per Diem		282.00
Airport Parking		13.00
Personal Auto		11.20
Support		
Computer	164 hours at \$10.00/hour	\$1,640.00
Telephone	30 calls at \$4.50/call	135.00
Copies	12,200 pages at \$0.07/page	854.00
Binders (3 inch)	32 at \$2.00 each	64.00
Federal Express Large (40 lb) Medium (20 lb) Small (10 lb)	4 at \$46.06 each	184.24
	4 at \$32.31 each	129.24
	8 at 25.44 each	
		203.52
TOTAL ODC's		\$5,204.96
SUBTOTAL	Labor, Overhead, and ODC's	\$35,196.98
G&A	10.95 %	\$3,854.07
SUBTOTAL		\$39,051.05
Profit	10 %	\$3,905.11
TOTAL PRICE		\$42,956.16

ATTACHMENT C

PRICE BREAKDOWN OTHER DIRECT COSTS

Task 1		
Long Distance Telephone Call	4 at \$4.50 per call	\$18.00
Copies	100 pages at \$0.07/page	7.00
Computer	24 hours at \$10.00/hour	240.00
Travel	Pittsburgh PA to Ravenna, OH 2 persons	
Car Rental	1.5 Days at \$26.75/day	40.13
Gas for Rental Car		12.00
Hotel	2 persons at \$50.00/night	100.00
Per Diem	3 days at \$30.00/day	90.00
TOTAL		\$507.13
Task 2		
Long Distance Telephone Call	4 at \$4.50/call	\$18.00
Copies	100 pages at \$0.07/page	7.00
Computer	8 hours at \$10.00/hour	80.00
Travel: Airfare	Pittsburgh PA to Columbus, OH 2 persons	1,220.00
Personal Auto	40 miles at \$0.28/mile	11.20
Hotel	2 at \$60.00/night	120.00
Airport Parking	2 at \$6.50/day	13.00
Per Diem	3 at \$34.00/day	102.00
Car Rental	1.5 days at \$27.00/day	40.50
Gasoline for Rental Car		4.00
TOTAL		\$1,615.70
TASK 3		
Long Distance Telephone Call	12 at \$4.50/each	\$9.00
Federal Express Small Package (10 lb)	8 at \$25.44 each	203.52
Copies	4,000 pages at \$0.07/page	280.00
Computer	100 hours at \$10.00/hour	\$1,000.00
Binders (3 inch)	8 at \$2.00/each	16.00
TOTAL		\$1,553.52

ATTACHMENT C
PRICE BREAKDOWN
OTHER DIRECT COSTS
PAGE 2

TASK 4		
Long Distance Telephone Call	2 at \$4.50/each	\$72.00
Travel	Pittsburgh, PA to Ravenna, OH 2 persons at \$610.00/each	
Car Rental	1.5 days at \$26.75/day	40.13
Gasoline for Rental Car		12.00
Hotel	2 at \$50.00/day	100.00
Per Diem	3 at \$30.00/day	90.00
TOTAL		\$251.13
TASK 5		
Long Distance Telephone Call	8 at \$4.50/each	36.00
Copies	8,000 pages at \$0.07/page	\$560.00
Computer	32 hours at \$10.00/hour	320.00
Binders (3 inch)	24 at \$2.00/each	48.00
Federal Express Medium Package (20 lb)	4 at \$32.31 each	129.24
Large Package (40 lb)	4 at \$46.06 each	184.24
TOTAL		\$1,277.48



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

INTEROFFICE MEMO

5 January 1994

From: W.B. Talmon, Jr. WBT
To: File

Location: Ravenna, OH
Location: Ravenna, OH

Subject: RCRA Part B Permit Application for RVAAP's OB/OD Grounds

Reference: January 4, 1994 telephone conversation between W.B. Talmon, Jr. and Mr. Murat Tukul, Ohio EPA.

At approximately 10:00 am, on Tuesday, January 4, 1994, Mr. Murat Tukul, of the Ohio EPA, called the writer. He indicated that he and Mr. Paul Anderson had been in communication with the central office of the Ohio EPA in Columbus with regard to the need for a Part B permit application for RVAAP's OB/OD Grounds.

Mr. Tukul reported that, if the Army and Operating Contractor plan to destroy only a small amount of material each year at the OB/OD grounds, the central office was inclined to waive the requirement for a Part B Permit and to issue emergency burning permits, as required. He indicated that under such circumstances, it would be necessary for installation representatives to meet with the regulators to resolve several issues, including the closure of some or all of the OB/OD grounds. The igloo where drums of ash residue are stored would also have to be addressed.

I explained to Mr. Tukul that our contract called for us to price the disposal of up to 4 short tons of industrial stocks each year, but anticipates that disposal actions will involve approximately 2,000 lbs. (1ST) per year. I indicated to Mr. Tukul that it was very likely the majority of the material would be suitable for commercial purposes and could be offered for sale through DRMS. Under such circumstances, only a small quantity of material would need to be treated as HW. I indicated, however, that I couldn't provide a specific figure.

I indicated to Mr. Tukul that, at the present time, we have been instructed to continue to pursue the installation's Part B permit application, and have requested a cost estimate and time schedule from Halliburton NUS, the firm that prepared the original permit application.

I promised to keep Mr. Tukul informed as I learn more.

cc: J.M. Higgins
W.B. Talmon, Jr.
J. Adams
COR
Environmental File

To: Environmental

1037

Message 47

Date Received: WED, 05 JAN 94 07:30:28 CST
Forward-Path: <orvaap@ria-emh1.army.mil>
Return-Path: <@ria-emh1.army.mil:dgushana@ex11.ria-emh2.army.mil>
Date: Wed, 5 Jan 94 7:28:47 CST
From: Diane Gushanas <dgushana@ria-emh2.army.mil>
To: RICHARD JANIK <DF01@ria-emh2.army.mil>
cc: ROBERT RADKIEWICZ <RRADKIEW@ria-emh2.army.mil>,
TIMOTHY HOWARD <THOWARD@riaemh2.army.mil>, eqm1@ria-emh1,
orvaap@ria-emh1
Subject: DCGPR COMMENTS/QUESTIONS ON RAVENNA AAP MAR FOR NOVEMBER 1993

TO: 1/10/94
LTCR
CONT ADM
PRO2 ADM
DASAS
CONTRACTOR
RETURN FOR FILE

SALLY/DEBBIE: THIS IS IN RESPONSE TO TASKER PW #94-95,
S: 7 JAN 93. PLEASE FORWARD TO AMSMC-PDF.

CONTRACTOR
FWD FOR
☐ Information
☐ Compliance as applicable
☐ Reply NLT

AMSMC-EQ (AMSMC-PDF/19 July 93) (200-1a) 1st End
SUBJECT: DCGPR Comments/Questions on Ravenna AAP MAR for November 1993

AMSMC-EQ

4 January 1994

THRU AMSMC-PDF

FOR AMSMC-DCGPR

RECEIVED
JAN 11 1994

1. In response to DCGPR request for status on item 4, Environmental, concerning the pursuit of the RCRA part B permit, the following are points of major interest and facts:

o Ravenna AAP is the interim storage site for industrial stocks. The proponent office for this interim storage mission is AMSMC-PD. They have indicated a requirement for the application and maintenance of a RCRA part B permit to allow any incidental burning of unstable stocks that may be necessary.

o The modified caretaker firm fixed price contract for RVAAP was awarded to Mason and Hangar (M&H). This contract includes provisions for application and maintenance of the RCRA part B permit by M&H. Mason & Hanger has been verbally notified by the PCO that this provision in the contract will be enforced. Although RVAAP is a modified caretaker facility, the majority of the plant is occupied with the storage mission and is not designated for excess.

o The Ohio EPA, upon hearing that RVAAP may consider discontinuing the application for the part B permit, was anxious to get a final decision from the plant in order to minimize any unnecessary effort.

CF: CRANE AAA
IN AAP by Heiden 1/10/94

o AMSMC-EQ has requested information from AMSMC-PD detailing their anticipated requirement for open burning. Once the quantity and frequency of the burning requirement is known, we will have a recommendation on the necessity of the part B permit. As it currently stands, the Command position is to have M&H pursue the permit as their contract specifies.

o The economics of a decision are estimated at best. This Headquarters has not yet been permitted for RCRA part B (OB/OD) at any installation. The installations are still operating OB/OD under interim status. Therefore the cost for completing all of the application requirements, answering the notices of deficiencies of the application, and completing any RCRA corrective actions associated with the permitting process are unknown. An estimate would start at \$500K and could extend into themillions.

o If the permit is deemed not to be required, the negotiation for burning ground closure milestones will begin. The cost estimates for this action is similarly unknown. This Headquarters has not yet performed a closure on a burning ground. Estimates by the Army Environmental Center are in the range of \$2-\$4M per acre of OB/OD site.

o In the past, open burning requirements at RVAAP have been handled on an emergency permit basis with the Ohio State officials and the Fire Marshall. This may be a feasible alternative for incidental burning at RVAAP. Although the cost comparison might be considered comparable between permitting or closing, the increased liability of maintaining a permitted RCRA unit may not be in the best interest of the Command.

2. The POC is Mr. Timothy Howard, AMSMC-EQE, extension 21088.

// SIGNED //
ROBERT J. RADKIEWICZ
Director, Environmental Qual Dir

CF:
AMSMC-DS
AMSMC-EQM
AMSMC-PCI-LB
AMSMC-PD
Commander's Representative, Ravenna Army Ammunition Plant,
ATTN: SMCRV-CO, 8451 State Route 5, Ravenna, OH 44266-9297

***** END OF MESSAGE *****

To: Sue McCausline

cc: JM Higgins
J. Adams
W.B. Talbot

TO: 2/7/94
400
ICONT ADM 2/7
ICONT ADM
ICONT SAS
ICONT CONTRACTOR 2/7
RETURN FOR FILE 7/7

Message 42

Date: MON, 07 FEB 94 07:06:48 CST
From: Robert J. Kasper <ORVAAP@RIA-EMH1.ARMY.MIL>
To: tbolton@spips8.ria-emh2.army.mil, swise@spips6.ria-emh2.army.mil,
oincdr@ria-emh1.army.mil, dpoxjk@ria-emh1.army.mil,
eq01@exl1.ria-emh2.army.mil
Subject: RCRA Part B NOD

SMCRV-CR (200-1a)

7 February 1994

CONTRACTOR
FWD FOR
☒ Information
☐ Compliance as
applicable
☐ Reply NLT

MEMORANDUM FOR Commander, U.S. Army Armament, Munitions and Chemical Command,
ATTN: AMSMC-PAI-G/Team A (Mr. Bolton), Rock Island, IL
61299-6000

SUBJECT: RCRA Part B Notice of Deficiency (NOD), Ravenna AAP

1. Ohio EPA granted an extension for response to RCRA Part B NOD in order for Ravenna AAP to obtain milestone dates for corrective action. Mason and Hanger, the operating contractor at Ravenna AAP, believes RCRA Part B is going to be cancelled by AMCCOM and has curtailed efforts to pursue corrective action until direction is received from PCO.

2. Please advise whether corrective action to NOD be taken as Mason and Hanger has indicated they will probably request additional funding.

3. POC is Mr. Robert J. Kasper, (216) 358-7311.

FOR THE COMMANDER:

RECEIVED

FEB 7 1994

//signed//
ROBERT J. KASPER
Commander's Representative

CF:
AMSMC-PDF (Mr. Kohrell)
AMSMC-EQE (Mr. Howard)
Cdr, INAAP (LTC Hunter)
Mason and Hanger-Silas Mason Company, Inc., Ravenna, OH 44266-9297

***** END OF MESSAGE *****

RECEIVED

cc: J.M. Higgins

WB

MAR 4 1994

CONVERSATION RECORD

TIME 1008

DATE 3 Mar 94

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☒ OUTGOING

ROUTING

NAME/SYMBOL

INT

M+H cy 3/3

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, dept., bureau, etc.)

TELEPHONE NO.

Paul Anderson

OEPA

963-1200

SUBJECT

RCCA Part "B"

SUMMARY

I explained to Anderson that the Army is still reviewing need for RCCA "B" and may revisit the plan to review same.

Anderson stated they need to know what the Army intends to do by 15 April 94.

Alternative to RCCA "B" would be emergency requests the frequency of which would be reviewed very closely.

According to OEPA records no one in Office has permit to OD and only Atlas Corder has permit for OB.

ACTION REQUIRED

Update MAR input + contact AMSMC-EQ

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

R Fasp

R Fasp

3 Mar 94

ACTION TAKEN

Mar updated

SIGNATURE

TITLE

DATE

R Fasp

LOK

3 Mar 94

Date: Tue, 15 Mar 94 10:38:34 CST
 From: Robert Radkiewicz <eq01@ria-emh>
 To: RICHARD JANIK <DF01@ria-emh2.ar>
 cc: DIANE GUSHANAS <EQE1@ria-emh2.a>
 Subject: DCGPR COMMENTS/QUESTIONS ON MAR
 PW94-179

OPTIONAL FORM 90 (7 90)

FAX TRANSMITTAL

of pages 6

To: BOB HASPER
 From: BOB WHELOVE
 Date: 3/16/94
 Agency: RAVENNA AAP
 Phone: 330-782-1092
 Fax: 330-782-1092
 NGN 7540 DT 317 7366 5080 101
 GENERAL SERVICES ADMINISTRATION

AMSMC-EQ (AMSMC-PDF/07 Mar 94) (200-1a) 1st End
 SUBJECT: DCGPR Comments/Questions on Ravenna AAP MAR for February
 1994

AMSMC-EQ

THRU AMSMC-PDF

FOR AMSMC-DCGPR

CONTRACTOR	
FWD FOR	
<input checked="" type="checkbox"/>	Information
<input checked="" type="checkbox"/>	Compliance as applicable
<input type="checkbox"/>	Reply NLT

14 March 1994

TO: 3/16/94	
LCR	
ICONT ADM	
IPRO ADM	
ICASAS	
ICONTACTOR	
IRETURN FOR FILE	

1. In response to AMSMC-DCGPR request for assurance of work being done on item 4, Environmental, "DF, we need to get this moving--one way or the other" concerning the pursuit of the Resource Conservation and Recovery Act (RCRA) part B permit, the following are points of major interest and facts:

a. This office has coordinated an evaluation of the requirement for a RCRA part B permit at Ravenna solely for contingent, subpart X open burning/open detonation (OB/OD) requirements for industrial stocks disposal (the installation has no other RCRA permit requirements). The evaluation is complete with background and conclusions at enclosure.

b. The coordinated recommendation to the plant is to discontinue the application for RCRA part B permit based on lack of quantifiable requirements.

c. This is part of a comprehensive OB/OD strategy formulation for the Command. Defining a fund source for out-year requirements has been and remains the major stumbling block in making determinations on this issue. Solving this problem is at the top of the agenda.

d. Key milestones for near-term actions on the Ravenna closure are as follows:

(1) Notify plant of AMCCOM recommendation - 14 March 1994

(2) Request assistance from plant through AMSMC-PDF and AMSMC-PAI to obtain a cost estimate and milestone schedule for closure plan preparation - 31 March 1994

(3) Meet with AMSMC-BP and AMSMC-PAI to identify fund source for RCRA closure plan and follow-on closure - 31 March 1994

(4) Meet with the plant and the Ohio Environmental Protection Agency to discuss closure milestones at their convenience.

e. Formulation of the comprehensive OB/OD minimization strategy for all AMCCOM installations will continue through the identification of quantifiable requirements for OB/OD Command wide.

2. The POC is Mr. Timothy Howard, AMSMC-EQE, extension 21088.

///SIGNED///
JAMES F. ZAK///FOR//
ROBERT J. RADKIEWICZ
Director, Environmental Qual Dir

CF:

Commander's Representative, Ravenna Army Ammunition Plant,
ATTN: SMCRV-CO, 8451 State Route 5, Ravenna, OH 44266-9297
AMSMC-PAI
AMSMC-EQM
AMSMC-PDJ

AMSMC-EQ (200-1a)

15 MAR 1994

MEMORANDUM FOR AMSMC-PAI

SUBJECT: Resource Conservation and Recovery Act (RCRA) Part B
Notice of Deficiency (NOD), Ravenna AAP

1. Reference electronic memorandum, Ravenna AAP, SMCRV-CR, 7 February 1994, SAB.
2. Request your office send enclosed memorandum to Ravenna AAP in response to referenced memorandum.
3. The point of contact for this action is Mr. Timothy Howard, AMSMC-EQE, extension 21088. *TbA*

Encl

CF (w/encl):
AMSMC-DSM
AMSMC-EQM
AMSMC-GC
AMSMC-IR
AMSMC-PDJ

J. Zak **SIGNED**
ROBERT J. RADKIEWICZ
Director, Environmental Qual Dir
for

AMSMC-PAI

MEMORANDUM FOR Commander's Representative, Ravenna Army
Ammunition Plant, ATTN: SMCRV-CR, 8451
State Route 5, Ravenna, OH 61299-6000

SUBJECT: Resource Conservation and Recovery Act (RCRA) Part B
Notice of Deficiency (NOD), Ravenna Army Ammunition Plant (AAP)

1. References:

a. Electronic mail memorandum, Ravenna AAP, SMCRV-CR,
7 February 1994, SAB.

b. Memorandum, Ravenna AAP, SMCRV-CR, 13 January 1994, SAB.

c. Meeting between this Headquarters, AMSMC-EQE, AMSMC-FAC,
AMSMC-PAI-G, AMSMC-PDJ-I, AMSMC-EQM, and AMSMC-GCS, 14 January
1994, SAB.

2. The modified caretaker contractor firm fixed price contract for Ravenna AAP was awarded to Mason and Hangar (M & H). This contract includes provisions for application and maintenance of the RCRA part B permit. Recently M & H and Ravenna AAP have questioned the necessity of this permit under the current operating scenario at the plant (reference 1a).

3. The Ohio Environmental Protection Agency (EPA), upon hearing that Ravenna AAP may consider discontinuing the application for the part B permit, was anxious to get a final decision from the plant in order to minimize any unnecessary effort.

4. This Headquarters, AMSMC-EQ, has made evaluations on the requirement for a RCRA part B permit at Ravenna solely for contingent, subpart X open burning/open detonation (OB/OD), requirements for industrial stocks disposal (the installation has no other RCRA permit requirements). Ravenna AAP is the interim storage site for industrial stocks. The proponent office for this interim storage mission is AMSMC-PD.

5. Historically, Ravenna AAP has a very small requirement for OB/OD of industrial stocks. In addition, the last of the propellant (known for its potential safety concerns due to instability) will be removed from Ravenna this quarter. Contingency requirements for excess industrial stocks can be handled through a variety of options such as, offering material to internal/external services/activities to fulfill requirements, sale through Defense Reutilization Marketing Office, utilized as donor material; etc. In the past, open burning requirements at Ravenna AAP have been handled on an emergency permit basis with the Ohio State officials and the Fire Marshall. This would continue to be the solution to an emergency burning situation at

AMSMC-PAI

SUBJECT: Resource Conservation and Recovery Act (RCRA) Part B
Notice of Deficiency (NOD), Ravenna AAP

Ravenna AAP. Therefore, in coordination with the industrial stocks managers from from this Headquarters, AMSMC-PD, it has been determined that there is no quantifiable future OB/OD requirement (reference 1b).

6. Before recommending official action be taken to discontinue the application for permit, an evaluation of costs and consequences was made. Defining a fund source for out-year requirements has been the major stumbling block in making a determination on this issue. The economics of a decision are estimated at best.

a. Permitting would require responses to the current and any future NODs as well as site maintenance and RCRA corrective action costs. This Headquarters has not yet been permitted for RCRA part B (OB/OD) at any installation. The installations are still operating OB/OD under interim status, therefore the cost for completing all of the application requirements, answering the notices of deficiencies of the application, and completing any RCRA corrective actions associated with the permitting process are unknown. An estimate would start at \$300K and could extend into the millions.

b. Discontinuing application will trigger closure requirements and milestones. The best method of proceeding would be to meet with the Ohio EPA and negotiate these milestones. The cost estimates for this action are similarly unknown. This Headquarters has not yet performed a closure on a burning ground. Estimates by the Army Environmental Center are in the range of \$2-\$4M per acre of OB/OD site. At least three other installations have already discontinued their permit applications and, therefore, have started down this path to closure. The source of funds for this option is currently being evaluated and has command-wide implications.

7. Although the cost comparison might be considered comparable between permitting or closing, the ever increasing liability and cost of maintaining a permitted RCRA unit is not in the best interest of the Command. Further, the Army cannot, in good faith, continue to pursue a permit for a hazardous waste treatment facility that has no foreseeable future requirements for use. Therefore, with the recognition that determinations of fund source need to be made, the coordinated AMCCOM recommendation (coordinated among Environmental Quality, Production, Procurement, Legal and Industrial Readiness Directorates) is to officially discontinue permit application.

AMSMC-PAI

SUBJECT: Resource Conservation and Recovery Act (RCRA) Part B
Notice of Deficiency (NOD), Ravenna AAP

8. The point of contact for this action is Mr. Timothy Howard,
AMSMC-EQE, DSN 793-1088.



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

INTEROFFICE MEMO

March 22, 1994

FROM: William B. Talmon, Jr. *WBT* LOCATION: Ravenna, OH
TO: Al Pope LOCATION: MHE, Lexington, KY
SUBJECT: Preparation of a Closure Plan Covering RVAAP's OB/OD Grounds and
an Associated Storage Building.

Reference: Our March 22, 1994 telephone conversation regarding this subject.

Transmitted herewith, as promised, for your review, is a copy of the draft closure plan that was submitted to the Ohio EPA as a part of the installation's RCRA Part B. Permit application, along with those technical comments from the Ohio EPA notice of deficiency (NOD) that pertain to the closure plan. Also transmitted herewith is an Ohio EPA guidance document that addresses the preparation of such plans.

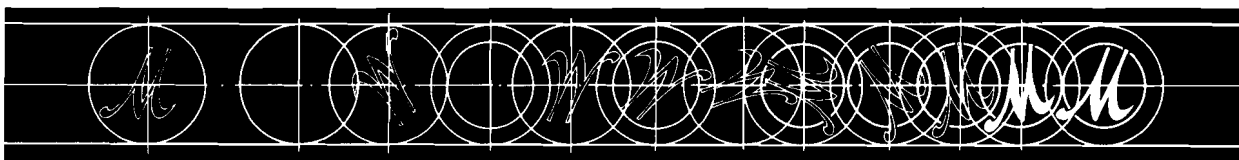
As I indicated during our conversation, we expect to be asked to furnish AMCCOM a cost estimate and a milestone schedule covering the preparation of the subject closure plan. It would be helpful if you could provide us with your input by March 31st.

Your estimate should cover the costs associated with several trips to Ohio, for site investigations and meetings with Army officials and State regulators. It should also cover the preparation of the required closure plan, along with responses to any NODs that are received from the Ohio EPA regarding the plan. It doesn't need to address the submission of any amended documents that may be required as a result of unanticipated site conditions that are discovered during closure activities. We will clearly indicate in our letter to the Government that the preparation of such documents was not addressed during the development of the cost estimate, and would need to be addressed with additional taskers.

If you have any questions, or need any additional information, please contact me at your convenience.

WBT:wbt

cc: J. M. Higgins, w/o Attachments
RCRA Part B. Permit File, w/o Attachments



March 30, 1994

Mr. William Talmon
Mason & Hanger-Silas Mason Co., Inc.
Ravenna Army Ammunition Plant
Building 1037
State Route 5
Ravenna, OH 44266-9297

Dear Bill,

Mason & Hanger Engineering Inc. (MHE) is pleased to submit our cost estimate for the preparation of a Closure Plan for the OB/OD Area, and a response to any new NOD's (2) issued by the State of Ohio. The cost estimate is based on the Scope of Work and proposed schedule which are enclosed. The estimated cost for this work is \$30,311.00.

This estimate does not include document printing or binding for submittals to OEPA.

If you need any additional information, please feel free to call Karen Czor at 606/223-4773.

Sincerely,

MASON & HANGER ENGINEERING INC.

H. Joe Wait
Vice President

MFL:HJW:640:rcw

Attachments

RECEIVED

APR 4 1994

**SCOPE OF WORK
FOR
PREPARATION OF CLOSURE PLAN
FOR
RVAAP OB/OD GROUNDS and
ASSOCIATED STORAGE BUILDING**

Mason & Hanger Engineering (MHE) will revise the Draft Closure Plan for the closure of the OB/OD Grounds and an Associated Storage Building (Bldg. 1601), located at RVAAP, by incorporating the Ohio EPA technical review comments contained in the September 29, 1993, Notice of Deficiency TA#2. The plan will be prepared following the Ohio EPA Closure Plan Review Guidance, dated May 1, 1991. MHE will make five visits to the RVAAP for site investigations and/or meetings with Army officials and Ohio regulators. MHE will submit one copy of the Revised Closure Plan to RVAAP for review and submittal to the Ohio EPA. If a Notice of Deficiency related to the Revised Closure Plan is received, MHE will respond and revise the Plan as appropriate. One copy of the Plan will again be submitted to RVAAP for review and submittal to Ohio EPA. If further deficiencies are noted by the Ohio EPA, MHE will address them and submit one copy of the Final document to RVAAP. This Scope of Work does not include work associated with the preparation and submission of amended documents that may be required as a result of unanticipated site conditions which are discovered during closure activities.

28 March 1994

Cost Estimate for RVAAP OB/OD Closure Plan

1. General

a) Project Management -- Karen Czor	25 MH
b) QA/QC Review -- Marion Lail	10 MH
c) Plan Overview -- Karen Czor	10 MH

2. Specific Items 60 through 78 on NOD

Engineer -- Karen Czor	178.5 MH
Tech Typing	95.5 MH

3. Additional NOD's (2)

Engineer -- Karen Czor	40MH/each = 80 MH
Tech Typing	15MH/each = 30 MH
QA/QC -- Marion Lail	5MH/each = 10 MH

4. Site Visits

Engineer -- Karen Czor	
a) Regulator Visits -- 5 trips 1.5 days each=	65 MH

Cost Estimate
Page Two

5. Labor Costs

Project Management -- Karen Czor

25MH * \$23.16 = \$579.00

QA/QC -- Marion Lail

20MH * \$26.25 = \$525.00

Technical Typing

125.5MH * \$8.83 = \$1,108.17

Engineering -- Karen Czor

333.5MH * \$23.16 = \$7,723.86

TOTAL DIRECT LABOR = \$9,936.00

Overhead (140%) = \$13,910.00

Subtotal = \$23,846.00

Profit (10%) = \$2,385.00

TOTAL LABOR COST = \$26,231.00

6. Expenses

Costs for Site Visits

a) Regulator 5 Trips * \$800.00/trip = \$4,000.00

Miscellaneous

Telephone = \$30.00

Shipping = \$50.00

TOTAL EXPENSES = \$4,080.00

TOTAL CONTRACT VALUE = \$30,311.00

RVAAP OB/OD Closure Plan

ID	Task Number/Description	Duration	Scheduled Start	1994							1995									
				Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
1	Notice to Proceed	1d	6/1/94 8:00am																	
2	Plan Update	70d	6/2/94 8:00am																	
3	QA/QC Review	5d	9/8/94 8:00am																	
4	MHE Submit Plan to RVAAP	1d	9/15/94 8:00am																	
5	RVAAP Review	5d	9/16/94 8:00am																	
6	RVAAP Submit Plan to Ohio EPA	1d	9/23/94 8:00am																	
7	Ohio EPA Review	35d	9/26/94 8:00am																	
8	Receive Comments from OEPA (NOD)	1d	11/14/94 8:00am																	
9	Update Plan to include OEPA NOD	15d	11/15/94 8:00am																	
10	QA/QC Review	2d	12/6/94 8:00am																	
11	MHE Submit Plan to RVAAP	1d	12/8/94 8:00am																	
12	RVAAP Review	5d	12/9/94 8:00am																	
13	RVAAP Submit Plan to OEPA	1d	12/16/94 8:00am																	
14	Ohio EPA Review	32d	12/19/94 8:00am																	
15	Receive Comments from OEPA (NOD)	1d	2/1/95 8:00am																	
16	Update Plan to include OEPA NOD	8d	2/2/95 8:00am																	
17	QA/QC Review	1d	2/14/95 8:00am																	
18	MHE Submit Plan to RVAAP	1d	2/15/95 8:00am																	
19	RVAAP Review	5d	2/16/95 8:00am																	
20	RVAAP Submit Plan to OEPA	1d	2/23/95 8:00am																	
21	Ohio EPA Review	25d	2/24/95 8:00am																	
22	Ohio EPA Approves Plan	1d	3/31/95 8:00am																	

Project: RVAAP OB/OD Closure
Date: 3/30/94
PM: Karen Czor

Critical



Noncritical



Progress



Milestone



Summary



Rolled Up



BILL!
FYI
me

28 March 1994

Cost Estimate for RVAAP OB/OD Closure Plan

1. General

a) Project Management -- Karen Czor	25 MH
b) QA/QC Review -- Marion Lail	10 MH
c) Plan Overview -- Karen Czor	10 MH

2. Specific Items on NOD

ITEM	Hours/Engineer	Hours/Tech Typing
60	6	15
61	2	1.5
62a	5	3
62b	2	1.5
63	5	1.5
64	5	1.5
65	Cannot be done by MHE ** See Note 1	
66i	1	
66ii	5	1
66iii	1	
67	20	3
68	2	3
69a	15	9
69b	2	1.5
69c	1	
69d	2	1.5
70	6	4.5
71	1	1
72a	N/A	
72b	5	3
72c	5	1.5

73a	6	3
73b	5	1.5
73c	1	1
73d	N/A	
73e	5	1.5
73f	1	1
73g	6	3
73i	N/A	
73j	5	1.5
73k	6	3
73l	6	3
73m	15	6
73n	.5	1
73o	10	3
74	.5	1
75	.5	1
76	.5	1
77	1	1
78ai	10	3
78aii	2	1
78b	5	3
78c	.5	1
78d	.5	1
78e	.5	1

3. Additional NOD's (2)

Engineer -- Karen Czor 40MH/each = 80 MH

Tech Typing 15MH/each = 30 MH

QA/QC -- Marion Lail 5MH/each = 10 MH

4. Site Visits

Engineer -- Karen Czor

a) Regulator Visits -- 5 trips 1.5 days each= 65 MH

5. Labor Costs

Project Management -- Karen Czor

25MH * \$23.16 = \$579.00

QA/QC -- Marion Lail

20MH * \$26.25 = \$525.00

Technical Typing

125.5MH * \$8.83 = \$1,108.17

Engineering -- Karen Czor

333.5MH * \$23.16 = \$7,723.86

TOTAL DIRECT LABOR = \$9,936.00

Overhead (140%) = \$13,910.00

Subtotal = \$23,846.00

Profit (10%) = \$2,385.00

TOTAL LABOR COST = \$26,231.00

6. Non-Labor

Costs for Site Visits

a) Regulator 5 Trips * \$800.00/trip = \$4,000.00

Miscellaneous

Telephone = \$30.00

Shipping = \$50.00

TOTAL NON-LABOR = \$4,080.00

TOTAL CONTRACT VALUE = \$30,311.00

Note 1: Section 3.15 of the Ohio EPA Closure Plan Review Guidance states, "The registered, professional engineer must be independent, meaning he cannot be directly employed by the owner/operator corporation or any of the corporation's subsidiaries."



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

FAX TRANSMITTAL

TO:

OFFICE: Mason & Hanger Engineering
NAME: Marion Lail
TELEPHONE: (606) 223-4773
FAX: (606) 223-1846

FROM:

OFFICE: Site Manager
NAME: Bill Talman
TELEPHONE: (216) 358-7400
FAX: (216) 358-7414

DATE: April 6, 1994
NO OF PAGES: 4
(Including Header Page)

Please phone us if all pages are not received.

COMMENTS: Here is the draft SDW, as we
discussed. Note requirement for separate
OB and OD Grounds Closure Plans, and
requirement for submission of drawings
and specifications.

RECEIVED

APR 6 1994

CONTRACTOR	
FWD FOR	
<input type="checkbox"/> Information	
<input checked="" type="checkbox"/> Compliance as applicable	
<input type="checkbox"/> Reply NLT	

P. 01

TO 4/6/94	
<input checked="" type="checkbox"/> LCR	
<input checked="" type="checkbox"/> CONT ADM	
<input checked="" type="checkbox"/> PROP ADM	
<input checked="" type="checkbox"/> GASAS	
<input checked="" type="checkbox"/> CONTRACTOR	
RETURN FOR FILE	

RCRA CLOSURE PLAN FOR THE OPEN BURNING GROUNDS

AND

THE OPEN DETONATION GROUNDS**CONTRACT SCOPE OF WORK****FOR****RAVENNA ARMY AMMUNITION PLANT**

OPTIONAL FORM 09 (7-93)

FAX TRANSMITTAL# of pages **3**

TO BOB HASPER	
FROM BOB WHELOVE	
DEPT/AGENCY RAVENNA ACO	
PHONE 793-1092	
FAX # 216-358-7314	
FAX # 793-1451	
NSN 7510-01-317-7368 5000 101 GENERAL SERVICES ADMINISTRATION	

DRAFT - TAKE YOUR SHOTS NOW**1. OBJECTIVE:**

a. **OVERALL PROJECT OBJECTIVE:** The objective of this project is to prepare closure plans for the Ravenna Army Ammunition Plant's (RVAAP) open burning grounds and the open detonation grounds in accordance with the Ohio Environmental Protection Agency regulations and all other State and Federal regulations.

b. **SPECIFIC OBJECTIVE OF THE REQUIREMENT:** This project includes;

(1) Supplying all labor, materials, and equipment necessary to prepare complete and technically adequate closure plans for the open burning grounds and the open detonation grounds. The closure plans shall be developed in accordance with the Ohio Regulation 3745-55-10, Applicability; closure and post closure. The plans shall be submitted to and approved by the Ohio Environmental Protection Agency. This scope of work also includes any and all revisions to the closure plans as required by the Ohio Environmental Protection Agency.

(2) Supplying all required information, documentation, labor, material, and equipment necessary for the development, transmittal, and approval of the open burning grounds and the open detonation grounds closure plans. Because a formal approval of closure plans is required by the Ohio Environmental Protection Agency, this scope of work includes addressing all comments and making any necessary revisions to the closure plans, as required to achieve formal approval for the Ohio Environmental Protection Agency. Copies of all comments from, and responses to the Ohio Environmental Protection Agency shall be provided to Ravenna AAP's ACO office.

2. **APPLICABLE DOCUMENTS:** The following documents (including all changes and amendments) are incorporated by reference. Where a document listed below refers to or incorporates one or more documents that are not listed (including all changes and amendments) those documents shall be considered as a part of this SOW. This list does not necessarily constitute all documents that may be applicable to the work performed under this contract. As the Government is relying upon the contractor and/or his subcontractor, the contractor is responsible and liable for compliance with all regulatorily required documents.

AMCR 385-100, Safety Manual
AR 200-1

cc: J.M. Higgins
J.M. Adams
S. McCauslin

AR 200-2

Provisions of contract DAAA09-93-C-0482

Ohio Regulation 3745-55-10, et. seq.

3. CONTRACTOR REQUIREMENTS:

a. The closure plans shall be developed in accordance with the Ohio Regulation 3745-55-10 Applicability: closure and post closure.

b. All work shall be done in accordance with the EPA, OSHA, and Ravenna AAP's regulations.

4. ENVIRONMENTAL RESPONSIBILITY: Notwithstanding the requirements set forth in this SOW, the contractor is responsible for complying with any and all State, Federal and local environmental laws and/or regulations. If any conflicts exist between regulation, the more stringent of the conflicting regulation shall take precedence.

5. PERIOD OF PERFORMANCE: Project work shall be completed in accordance to the following schedule:

Submit Closure Plans-120 days after contract modification incorporating this scope of work.

Answer State's comments and make revisions requested by State - 60 days after receipt of State's comments or within the time allowed by the State, which ever is sooner.

Submit closure drawing and specifications to State for approval - 120 days after State approval of Closure Plans or within the time allowed by the State, which ever is sooner.

Incorporate revisions of Closure drawings and specifications as required by the State - 60 days after receipt of the State's comments on the Closure drawings and specifications or within the time frame allowed by the State, which ever is sooner.

6. REPORTING REQUIREMENTS: The reporting shall be in accordance to that contained contract DAAA09 - 93 -C-0482 and the Ohio Environmental Protection Agency approved closure plans. The contractor shall also submit monthly progress reports, in the contractors preferred format, to the ACO office. the contractor shall submit one copy of the initial closure plans (thru Ravenna AAP's ACO Office) to the Ohio Environmental Protection Agency, three copies to Ravenna's ACO office. Any revised closure plans shall again be submitted as described in the previous sentence.

7. FINAL INSPECTION/ACCEPTANCE:

a. Work will be monitored during the development of the closure plans, and shall be accepted as complete by Ravenna's ACO, only after the formal approval of the closure plans by the Ohio Environmental Protection Agency.

b. The contractor shall provide a certificate stating that the contractor has complied with the requirements of the Scope of Work and all applicable Federal, State and local regulations.

cc: Sue McCauslin

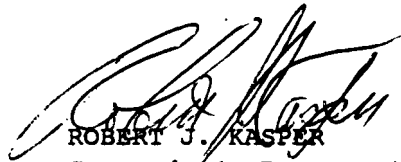
TO: []
FROM: []
SUBJECT: []
DATE: 4/11/94
CTOP
FOR FILE

8 April 1994

MEMORANDUM FOR THE RECORD

SUBJECT: RCRA Part "B" Permit

1. Ms. S. Wise, AMSMC-PAI-G, (309) 782-3764, called on 7 Apr 94 to confirm that AMSMC-EQ (POC Bob Whelove, (309) 782-1092) recommendation not to pursue the RCRA PART "B" has been adopted. She stated that Messrs. T. Bolton, Whelove and Tim Houston, are planning a trip to arrive at Ravenna AAP on Wednesday, 13 Apr 94, for a review of the OB/OD grounds and would like a meeting with the Ohio EPA on 14 Apr 94.
2. I contacted Ohio EPA, Mr. Murat Tukul's office, on 7 Apr 94 and left message. Mr. Tukul called back on 8 Apr 94 and agreed that he and Mr. Paul Anderson would meet with us on 14 Apr 94 at 0900 hours. He requested a letter confirming that the Part "B" will not be pursued. Mr. William Talmon, Site Manager, Mason and Hanger, will have Ms. Sue McCauslin draft a letter on Monday, 11 Apr 94.
3. Mr. Tukul called again 8 Apr 94 to change meeting from 0900 hours to 1330 hours on 14 Apr 94. Info was given to AMCCOM and Mr. Talmon.
4. POC is Mr. Robert J. Kasper, (216) 358-7311.


ROBERT J. KASPER

Commander's Representative

Hand to INMAG 4/11/94



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

April 11, 1994

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

TO: Director,
Ohio Environmental Protection Agency
1800 WaterMark Drive
P. O. Box 1049
Columbus, Ohio 43266-0149

Subject: RCRA Part B Permit Application, Ravenna Army Ammunition Plant,
EPA ID# OH5 210 020 736

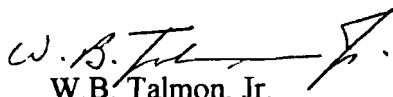
Dear Sir:

This letter is to provide formal notification to your Agency that, due to the change in mission and reduction of activity at the Ravenna Army Ammunition Plant, the U.S. Army has decided to discontinue its pursuit of a RCRA Part B permit for storage and OB/OD activities at this facility.

A meeting with representatives of the Army and the Ohio EPA Northeast District Office has been scheduled for Thursday, April 14 at RVAAP to discuss closure of the RCRA facilities.

The M&H point of contact for this subject is Mr. William Talmon, Jr., Site Manager, at (216) 358-7400. The Government point of contact is Mr. Robert Kasper, Commander's Representative, at (216) 358-7311.

Sincerely,
Mason & Hanger-Silas Mason Co. Inc.


W.B. Talmon, Jr.
Site Manager

cc: W.B. Talmon, Jr.
Mr. Paul Anderson
Mr. Murat Turkel
Environmental File

April 14, 1994 Meeting w/ Ohio EPA Regarding
Closure of OB/OD Grounds at RVAAP -

For Ohio EPA, the installation should
Notify Region V that RVAAP does not intend to
pursue its Part B permit.

The installation will need to respond to
comments re the revised closure plan for the deact.
Furnace.

Ohio EPA will send us Oct '93 Closure Plan
Review Guidance.

4-14-94

Ravenna Arsenal

Facility Closure mtg

<u>Name</u>	<u>Representing</u>	<u>telephone</u>
Paul Anderson	Ohio EPA	(216) 963-1228
Murat Tukul	Ohio EPA	(216) 963-1192
DAN LUKOVIC	OHIO EPA	(614) 644-2965
Ken RISTOW	OHIO EPA	(216) 963-1192
TIM HOWARD	HQ Amccom	(309) 782-1088
BOB KASPER	RV/AAFP	216-358-7311
BOB WHELOVE	HQ Amccom	309 782 1092
TOM BOLTON	HQ AMCCOM	309-782-4725
Susan McCauslin	AAH Consultant	216-358-7512
William Talmon	Mason & Hanger	216-358-7400

cc: Sue McCauslin
J.M. Higgins

CONTRACTOR
FWD FOR
<input checked="" type="checkbox"/> Information
<input checked="" type="checkbox"/> Compliance as applicable
<input type="checkbox"/> Reply NLT

TO 4/25/94
LCR
CONT ADM
PROD ADM
CONTRACTOR
RETURN FOR FILE

WBT
AMSMC-EQE
(200-1a)
19 April 1994

TRIP REPORT

SUBJECT: Trip Report for Bob Whelove, Jr. and Timothy Howard
Travel to Ravanna AAP 13 - 15 April 1994.

Purpose of Visit:

o The purpose of the visit was for the government staff to meet in the morning of 14 April 1994 to ensure that all government parties were in agreement about the decision to inform the Ohio Environmental Protection Agency (EPA) that we were discontinuing our application for a RCRA part B permit. Also, we toured the affected areas and most of the plant in order to become more familiar with the plant. The plant contractor was included in the meetings.

o The afternoon was devoted to meeting with the Ohio EPA and to listen to their concerns and the areas of the plant they wanted clean-up action on. The Ohio EPA brought several new persons with them and they toured the affected areas after the meeting. The ACO staff was the host of the tour and they indicated no new issues were raised as a result of the tour.

Personnel Contacts: See Enclosure 1

Result of Trip:

o Discussions - Closure plans are now required for the RCRA part A units (burning grounds, demo grounds, and drum storage igloo), as well as the deactivation furnace (a unit which was already in closure process).

oo The Ohio EPA indicated that they owed the plant a Notice of Deficiency (NOD) on the closure plan for the DEAC furnace, and that it could be expected in May. They further indicated that the closure plan could be combined with the closure plans for the part A units (for which we already have an NOD).

o Emergency burning of unstable energetic materials in the future would have to encompass decontaminations and sampling of the emergency burning area immediately after the burning event. The resolution of these emergencies would be on a case by case basis. The plant assured the Ohio EPA that the unstable energetics such as propellant would be removed from the plant and the likely-hood of an emergency burn would be minimal.

o Special considerations with regard to the historical contamination at the burning ground are anticipated.

RECEIVED

APR 25 1994

CF 20K, 1NAAP 4/25/94

AMSMC-EQE

SUBJECT: Trip Report for Bob Whelove, Jr. and Timothy Howard
travel to Ravanna AAP, 13 - 15 April 1994

oo Representatives from this office expressed interest in limiting the closure clean-up to the contamination from the permitted unit only. The Ohio EPA indicated that it may be very difficult to establish the bounds of the permitted units, but they encouraged the plant to work toward this end.

o We made the Ohio EPA aware that since RVAAP is an inactive plant, there is no source of compliance funds for these closures, and that we had requested funding appropriation guidance from higher HQ. The Ohio EPA expressed understanding and indicated that they would be sending a memorandum to the plant in mid May requesting a milestone schedule for the closures. They encouraged the plant to be as realistic as possible.

Required Actions/Taskers:

o Requirements for completing closures at RVAAP are as follows:

oo Establish milestones for the Ohio EPA for:

- ooo funds identification
- ooo sow preparation
- ooo contract award
- ooo closure plan completion
- ooo closure plan execution

o The Ohio EPA indicated that RVAAP should contact the Region V U.S. EPA to notify them that the application for RCRA part B permit would be discontinued. Region V retained the authority to pursue corrective actions at the plants SWMUs under RCRA 3008 (h). This will certainly initiate future actions at the plant.

o Identify fund source for compliance requirements at inactive installations.

o Develop a SOW to incorporate the closure plans for the DEAC furnace, burning grounds, demo ground, and storage igloo with the appropriate NOD comments, and the new Ohio EPA guidance document.

o Initiate contract to execute SOW through PBMA task order contract or EQ/PAE Basic Order Agreement.

AMSMC-EQE

SUBJECT: Trip Report for Bob Whelove, Jr. and Timothy Howard
Travel to Ravanna AAP 13 - 15 April 1994

- o Submit closure plan for approval.
- o Execute approved closure plan.

Bob Whelove, Jr.

Robert W. Whelove Jr.

Timothy Howard

Timothy Howard

Environmental Engineers
AMSMC-EQE

CF:

AMSMC-BPA-O, w/o encl

AMSMC-PAI/G, w/o encl

AMSMC-PDJ-I, w/o encl

AMSMC-EQM, w/o encl

AMSMC-PAE-E

Commander's Representative, Ravanna AAP

Commander, Indiana AAP



State of Ohio Environmental Protection Agency

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

RECEIVED

MAY 9 1994

NOTICE OF DEFICIENCY

May 3, 1994

RE: AMENDED CLOSURE PLAN
RAVENNA ARMY AMMUNITION PLANT
02-67-0209
OH5 210 020 736

CERTIFIED MAIL

Mr. Robert J. Kasper
Ravenna Army Ammunition Plant
Ravenna Arsenal
8451 State Route 5
Ravenna, Ohio 44266-9297

Dear Mr. Kasper:

On July 22, 1993, Ohio EPA received from Ravenna Army Ammunition Plant an amended closure plan for a hazardous waste incinerator (deactivation furnace) located at 8451 State Route 5, Ravenna, Ohio.

This amended closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the Ravenna Army Ammunition Plant's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the amended closure plan in accordance with OAC Rule 3745-66-12. The public comment period extended from September 13, 1993 through October 18, 1993. No public comments were received by Ohio EPA.

Pursuant to OAC Rule 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the amended plan, outlined in Attachment A.

Please take notice that OAC Rule 3745-66-12 requires that a modified amended closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

CF:

Amme-EQ (WHELOVE)

COR, INAP

TO 5/4/94

CON	
CONT ADM	
PROP ADM	
CONTRACTOR	
RETURN FOR FILE	

George V. Voinovich
Governor

Donald R. Schregardus
Director

CONTRACTOR
FWD FOR

<input type="checkbox"/> Information
<input type="checkbox"/> Compliance as applicable
<input type="checkbox"/> Reply NLT 6/3

7/13/94
3/6/3/94



Mr. Robert J. Kasper - Ravenna Army Ammunition Plant
Page Two

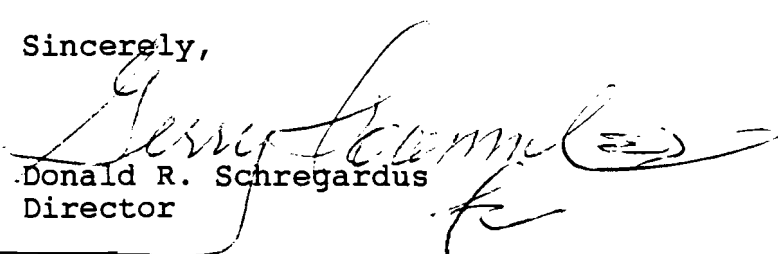
The modified amended closure plan shall be prepared in accordance with the following editorial protocol or convention:

1. Old Language is over-struck, but not obliterated.
2. New Language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified amended closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Murat Tukul, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Upon review of the resubmitted plan, I will prepare and issue a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Murat Tukul at (216) 963-1200.

Sincerely,



Donald R. Schregardus
Director

DRS/mt/fwn

cc: Tom Crepeau, DHWM Central File, Ohio EPA
Section Chief, Ohio Permit Section, U.S. EPA - Region V
Randy Meyer, Ohio EPA, DHWM, CO
Murat Tukul, Ohio EPA, DHWM, NEDO
Paul Anderson, Ohio EPA, DHWM, NEDO

ATTACHMENT A

RAVENNA ARMY AMMUNITION PLANT
DEACTIVATION FURNACE CLOSURE

02-67-0209
OH5 210 020 736

1) Section 7.2-B: Remediation Limits/Site Specific Risk Based Closure:

RVAAP shall revise the closure plan to include the corresponding calculations and assumptions that were used in developing the site specific risk-based cleanup standards. RVAAP provided the site specific risk-based cleanup standards in Table 2 on page 10 of the closure plan. Also on page 9 of the closure plan, RVAAP referred to the Ohio EPA's Closure Plan Guidance Manual (dated May 1, 1991) methodology in developing these standards. Since the standards appear to be high, RVAAP must justify all site-specific assumptions and calculations or revert to remediation clean-up limits established by the background sampling.

2) Section 7.2-B: Remediation Limits/Site Specific Risk Based Closure:

RVAAP shall revise the closure plan to justify the proposed remediation cleanup limit for lead (Pb). RVAAP proposed using 150 ppm as a remediation cleanup limit, since the source of contamination is not suspected to be from a RCRA unit. According to the Ohio EPA's Closure Plan Guidance Manual dated May 1, 1991 (page 55) which RVAAP utilized to prepare this plan, the owner/operator may select the highest of; 1) the upper confidence limit for total lead in "natural" soils or 2) the upper confidence limit for lead in background soils, up to a maximum of 150 ppm as a clean standard. Therefore RVAAP's proposal of 150 ppm as a clean standard for lead is not acceptable. RVAAP shall either use its background sample results or Ohio Farm Soils data in determination of clean standards for lead. Also RVAAP contends that the source of lead (Pb) contamination is from burning activities on the ground in the area before 1980. In order to demonstrate that soil contamination is from a source different than the RCRA unit being closed, RVAAP must identify an alternative source(s) of contamination, document that no releases from the unit being closed have occurred and include detailed arguments for one of the possibilities listed in page 17 of the Ohio EPA's Interim Final Closure Plan Review Guidance (September 1993).

3) Section 7.2-C: Disposal or Decontamination of Soils/Confirmation Sampling:

RVAAP shall revise the closure plan to include the recommended grid length formula given in the Ohio EPA's Interim Final Closure Plan Review Guidance Manual (September 1993). The formula that RVAAP utilized in its closure plan is recommended for sites greater than 3 acres (Ohio EPA's Closure Plan Review Guidance, May 1991), therefore this calculation is not acceptable. RVAAP shall utilize the grid calculation formula described in Section 3.13 of the Interim Final Closure Plan Review Guidance (September 1993). In order to obtain your copy of the guidance, please contact Ms. Pat Swaney at (614) 644-2956.

4) Section 7.2-D: Excavation Areas:

RVAAP shall revise its closure plan to re-evaluate the extent of horizontal and vertical contamination and excavation/remediation area dimensions after determining the site specific remediation limits. Also if soil contamination is found at the soil/groundwater interface, the closure plan will be amended to include ground water monitoring.

5) Section 7.2-E: Disposal or Decontamination of Soils/Disposal:

RVAAP shall revise the closure plan to include the details on the excavated soil storage area. RVAAP's amended closure plan shall specify the following at a minimum: excavated soil pile storage location, dimensions, details on pavement and/or secondary containment, liner and cover details, a map or a diagram of the area, equipment, removal pattern and depth increments. The closure plan should also clearly define how soil will be removed, stored, loaded and managed once it leaves the property. Please be aware that temporary staging hazardous waste on the ground, even on a liner constitutes creation of a waste pile and is subject to potential enforcement action and additional closure requirement. The Ohio EPA recommends that RVAAP containerize all the excavated soils since they might exhibit a characteristic of hazardous waste or meet the definition of a listed waste. Only soils that do not meet the above mentioned definition (solid wastes) can be staged in a manner described in the closure plan.

6) Section 7.2-E: Disposal or Decontamination of Soils/Disposal:

RVAAP shall revise the closure plan to state that the SW-846 sampling strategy will be applied to the excavated soil storage pile as well as the containerized wastes in order to obtain a representative sample.

7) Section 7.2-F: Disposal or Decontamination of Soils/Follow-up Remediation:

RVAAP shall revise the closure plan to state that an amended closure plan will be submitted in order to address further remediation and sampling activities if the confirmation samples indicates any further contamination. This plan will be contingent upon Ohio EPA's approval.

8) Appendix B: Sampling and Analysis Analytical Results:

RVAAP shall revise the closure plan to include copies of the original analytical results from the laboratories with the authorized certification signatures. Also RVAAP shall include the statistical analysis details (i.e. probability plots and fit tests) for these calculations. RVAAP can refer to the Ohio EPA's Interim Final Closure Plan Guidance (September 1993) page 33 for details.



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

May 23, 1994

THRU: Contracting Officer's Representative
Ravenna Army Ammunition Plant
ATTN: Mr. Robert J. Kasper
8451 State Route 5
Ravenna, Ohio 44266-9297

TO: Commander
U.S. Army Armament, Munitions and Chemical Command
ATTN: AMSMC-EQM (Ronnie DePorter)
Rock Island, IL 61299-7190

Subject: 1383 Report Project Exhibit for Revision of Deactivation Furnace Closure Plan -
RVAAP (Ref. AMCCOM Memorandum 17 May 1994)

Dear Sir:

As requested in the subject memorandum, attached is the 1383 Report Project Exhibit for the revision of the RCRA Amended Closure Plan for the RVAAP Deactivation Furnace. The plan must be revised in accordance with a Notice of Deficiency letter received from Ohio EPA.

The Mason & Hanger Point of Contact for this subject is Ms. Susan McCauslin, Environmental Specialist, (216) 358-7512.

Sincerely,
Mason & Hanger-Silas Mason Co. Inc.

H. D. McGehee
for - W.B. Talmon, Jr.
Site Manager

cc: W.B. Talmon, Jr.
File

Record Status: ACTIVE
Date Entered: 05/23/94
Date Revised: 05/23/94
Date Discontinued:

Facility: RAVENNA AAP
FFID: OH-213820736 Owner Type: GOCO
Support Installation:
Facility Type: GOCO

City: RAVENNA
State: OH Country: USA EPA:
Zip: 442669297

Address: 8451 STATE ROUTE 5
Contact: MS. SUSAN MCCAUSLIN
Telephone: 216-358-7512

Project Number: RVAP052394

Operable Unit:

Pillar: CMP

Local Project Number:

Local Project ID Type:

Year Funding Required: 1994

Project Name: REVISE DEACTIVATION FURNACE AMENDED CLOSURE PLAN

Fiscal Year Completed:

Project Assessment: H

Class: 1 Law/Req: RCRA

Project Status: PLANNING PHASE

Compliance Status: INOV

Pollution Category: HAZD

Must Fund: Y

Program Area: HAZD WASTE

NACOM Priority:

Initiation Reason:

Instn Priority: H

Discontinue Reason:

Plan/Design Scheduled Completion: 09/94

Work/Const Scheduled Completion: /

Work/Constr Scheduled Start: /

Final Compliance Required: 06/94

Fund Type: OMA, Operations and Maintenance, Army (Env Compliance)

Total Est. Cost: 50

AMS Code	FY	Required Prq/Bdqt Obligated	AMS Code	FY	Required Prq/Bdqt Obligated	AMS Code	FY	Required Prq/Bdqt Obligated

722856.43	1994	50	0	0
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Narrative:

THE CURRENT DEACTIVATION FURNACE AMENDED CLOSURE PLAN MUST BE REVISED TO ANSWER DEFICIENCIES CITED IN AN OHIO NOD LETTER.

THE SUSPENSE DATE FOR A RESPONSE TO THE WDD LETTER IS 6/3/94.

To: Susan McCanslin

WBT

CONVERSATION RECORD			TIME 1250	DATE 8 Jun 94												
TYPE	<input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE			<table border="1"><thead><tr><th colspan="2">ROUTING</th></tr><tr><th>NAME/SYMBOL</th><th>INT</th></tr></thead><tbody><tr><td>MTH</td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></tbody></table>	ROUTING		NAME/SYMBOL	INT	MTH							
ROUTING																
NAME/SYMBOL	INT															
MTH																
Location of Visit/Conference:																
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (Office, dept., bureau, etc.)	TELEPHONE NO.														
MURAT TUCKER	OEPA	1-963-1192														
SUBJECT																
Deactivation Furnace NOD Suspense																
SUMMARY																
Left message on Tucker's answering machine requesting an extension & Suspense of 6/9/94 as AMCCOM is trying to decide:																
A. Make good of OB/OL																
B. Obtain separate funds.																
Please call me!																
RECEIVED																
JUN 8 1994																
ACTION REQUIRED																
Follow-up w/call if no response																
NAME OF PERSON DOCUMENTING CONVERSATION		SIGNATURE	DATE													
R Kasp		R Kasp	8 Jun 94													
ACTION TAKEN																
SIGNATURE		TITLE		DATE												

To: Susan McLauslin

CONVERSATION RECORD

TIME

1030

DATE

9 Jun 94

TYPE

☐ VISIT

☐ CONFERENCE

☐ TELEPHONE

ROUTING

NAME/SYMBOL INT

M+H cey

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Murat Tuckel

ORGANIZATION (Office, dept., bureau, etc.)

OEPA

TELEPHONE NO.

1-963-1200

SUBJECT

Suspense NOO Deac Furnace

SUMMARY

Asked Tuckel if he received my message:

Tuckel: Yes but I don't have an answer now. He will be at RV RAP 13 Jun 94 and we can discuss the matter. No further action for now.

RECEIVED

JUN 9 1994

CONTRACTOR	
FWD FOR	
<input type="checkbox"/> Information	
<input type="checkbox"/> Compliance as applicable	
<input type="checkbox"/> Reply NLT	

ACTION REQUIRED

Meet w/Tuckel 13 Jun 94

NAME OF PERSON DOCUMENTING CONVERSATION

R/KASPER

SIGNATURE

Stack

DATE

9 Jun 94

ACTION TAKEN

SIGNATURE

TITLE

DATE

To: Susan McCansline

2015

CONVERSATION RECORD		TIME 0945	DATE 10 Jun 94
TYPE	<input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE		ROUTING NAME/SYMBOL INT M+H Cg
	<input checked="" type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING		
Location of Visit/Conference:			
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Henry Crain	ORGANIZATION (Office, dept., bureau, etc.) AMS MC-EQ	TELEPHONE NO. (309) 782-1434	
SUBJECT Deactivation Furnace			
SUMMARY Crain: Wilson may have to write Scope if AMCCOM cannot contract it out. He noticed 150 PPM max lead std and would change to 28 PPM MAX. Kasp: O EPA will be on post 13 Jun and I will ask for an extension to the W.O.D. for as long as they will give similar to your O B/O Milestones. Crain: Will send milestones for DEAC ASAP.			
ACTION REQUIRED Info			
NAME OF PERSON DOCUMENTING CONVERSATION R Kasp	SIGNATURE [Signature]	DATE 10 Jun 94	
ACTION TAKEN			
RECEIVED			
SIGNATURE	TITLE	JUN 10 1994	

CC: J. M. Caulder

TO	0/13/94
L CR	
CONT ADM	
PROP ADM	
CONTRACTOR	
RETURN FOR FILE	

Message 37

Date: MON, 13 JUN 94 14:12:35 CDT
From: Robert J. Kasper <ORVAAP@RIA-EMH1.ARMY.MIL>
To: eqel@ex11.ria-emh2.army.mil, tbolton@spips8.ria-emh2.army.mil,
swise@spips6.ria-emh2.army.mil, rtubbs@spips8.ria-emh2.army.mil,
oincdr@ra-emh1.army.mil

SMCRV-CR (200-1a)

13 June 1994

MEMORANDUM FOR Commander, U.S. Army Armament, Munitions and Chemical Command,
ATTN: AMSMC-EQE (Mr. Bob Whelove), Rock Island, IL
61299-6000

SUBJECT: NOD for Resubmission of Closure Plan for Deactivation Furnace at
Ravenna Army Ammunition Plant

1. Reference meeting between Mr. R. Kasper, RVAAP, and Mr. Murat Tukul, Ohio EPA, 13 Jun 94, SAB.
2. Per discussion in referenced meeting, Ohio EPA has granted a 30 day extension until 13 Jul 94 for response to subject NOD.
3. POC is Mr. Robert J. Kasper, (216) 358-7311.

FOR THE COMMANDER:

//signed//
ROBERT J. KASPER
Commander's Representative

CONTRACTOR
FWD FOR
<input checked="" type="checkbox"/> Information
<input type="checkbox"/> Compliance as
applicat's
<input type="checkbox"/> Reply NLT

CF:
AMSMC-PAI-G/Team A (Mr. Bolton)
AMSMC-PDF (Mr. Tubbs)
Cdr, INAAP (LTC Hunter)

***** END OF MESSAGE *****

RECEIVED

JUN 15 1994

TELEPHONE OR VERBAL

CONVERSATION RECORD

TIME

14:00

DATE

June 21, 1994

TYPE

☐ VISIT☐ CONFERENCE☒ TELEPHONE☒ INCOMING☐ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT
WITH YOUORGANIZATION (Office, dept., bureau,
etc.)

TELEPHONE NO.

Mr. Bob Whelove

AMCCOM Environmental

SUBJECT

Deactivation Furnace Notice of Deficiency

ROUTING

NAME

INT

WBT

COR

SUMMARY

Bob Whelove called to get some answers to questions he had regarding the OEPA Notice of Deficiency letter for the Deactivation Furnace closure. He informed me that he and an associate at AMCCOM had been tasked with responding to the NOD. I answered his questions, and also informed him that in answering the NOD it would be necessary to re-write the amended closure plan, including re-evaluating the area requiring excavation in order to meet "clean" levels in response to their comments in the NOD. He indicated that he felt he was not prepared to accomplish that type of response, and would discuss with his supervisor the possibility of providing OEPA with a schedule for response similar to the ones issued for the OB/OD closures rather than providing OEPA with a response to the NOD. He will keep us apprised.

ACTION REQUIRED

NONE

NAME OF PERSON DOCUMENTING CONVERSATION

S. McCauslin

SIGNATURE

S. McCauslin

DATE

6-22-94

ACTION TAKEN

SIGNATURE

TITLE

DATE



DEPARTMENT OF THE ARMY

HEADQUARTERS, U.S. ARMY ARMAMENT, MUNITIONS AND CHEMICAL COMMAND
ROCK ISLAND, ILLINOIS 61299-6000



REPLY TO
ATTENTION OF

AMSMC-EQ (200-1a)

CONTRACTOR
FWD FOR

- ☐ Information
☐ Compliance as applicable
☐ Reply NLT _____

MEMORANDUM FOR Commander's Representative, Ravenna Army
Ammunition Plant, ATTN: SMCrv-CR,
8451 State Route 5, Ravenna, OH 44266-9297

SUBJECT: Response to a Notice of Deficiency on the Closure Plan
for the Deactivation Furnace at Ravenna Army Ammunition Plant
(AAP)

1. References:

a. Letter, State of Ohio Environmental Protection Agency, no
subject, 3 May 1994.

b. Memorandum, HQ, AMCCOM, AMSMC-EQ, 7 July 1994, SAB.

2. The following deadlines can be used to respond to the Ohio
Environmental Protection Agency Notice of Deficiency:

FUNDING SOURCE - 15 September 1994

CONTRACT ADMINISTRATION - 15 December 1994

COMPLETED CLOSURE PLAN - 15 August 1995

3. This Headquarters, AMSMC-EQ, is considering using a
Production Base Modernization Activity taskorder contractor to
perform these tasks. There are too many variables at this time
in the writing of the closure plan to extend deadlines beyond the
completion of the closure plan. As the completion nears, this
Headquarters will better be able to predict future deadlines.
Also, at the present time, there is no source for funds for this
effort. After the taskorder contractor is on board, deadlines
will be given for accomplishing this work. These are the most
reasonable dates that can be predicted at this time.

4. The point of contact for this action is Mr. Bob Whelove, Jr.,
AMSMC-EQE, DSN 793-1092.

OPTIONAL FORM 93 (7-93)

FAX TRANSMITTAL

of pages > 2

To: BOB MASPER	From: BOB WHELOVE
Dept./Agency: RIAAP	Phone #: 793-1092
Fax #: 316 358 7314	Fax #: 309 782 1092

Robert J. Radkiewicz
ROBERT J. RADKIEWICZ
Director, Environmental Qual Dir

AMSMC-EQ

SUBJECT: Response to a Notice of Deficiency on the Closure Plan
for the Deactivation Furnace at Ravenna Army Ammunition Plant
(AAP)

CF:

Commander, Indiana Army Ammunition Plant, ATTN: SMCIN-CO,
Charlestown, IN 47111-9667

RECEIVED

JUL 11 1994



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

July 11, 1994

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

TO: Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087-1969
ATTN: Mr. Murat Tukel, DHWM

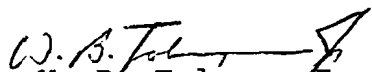
SUBJECT: Notice of Deficiency
RE: Amended Closure Plan
Ravenna Army Ammunition Plant
02-67-0209
OH5 210 020 736
(Ref. Ohio EPA letter, 5/3/94)

Dear Mr. Tukel:

Transmitted herewith is a proposed schedule from AMCCOM's Environmental Quality Directorate covering the development of an amended closure plan for the installation's deactivation furnace.

Please feel free to contact me at (216) 358-7400, or Mr. Robert Kasper at (216) 358-7311, if you have any questions or comments regarding the proposed schedule.

Sincerely,
Mason & Hanger - Silas Mason Co., Inc.


W. B. Talmon, Jr.
Site Manager

WBT:wbt

cc: J. M. Higgins
W. B. Talmon, Jr.
Mr. Paul Anderson



cc: J.M. Higgins

~~Susan McCauslin~~

WB

7/29/94	
CONT ADM	
PROP ADM	
CONTRACTOR	7/29
RETURN FOR FILE	

Message 51

Date: FRI, 29 JUL 94 07:13:03 CDT
From: Robert J. Kasper <ORVAAP@RIA-EMH1.ARMY.MIL>
To: ocnc@ria-emh1.army.mil, eq01@ex11.ria-emh2.army.mil,
tbolton@spips8.ria-emh2.army.mil, rtubbs@spips8.ria-emh2.army.mil
Subject: Deac Furnace Closure Plan RVAAP

SMCRV-CR (200-1a)

29 July 1994

MEMORANDUM FOR Commander, Crane Army Ammunition Activity, ATTN: SMCCN-CO,
300 Highway 361, Crane, IN 47522-5099

SUBJECT: Revised Deactivation Furnace Closure Plan

1. Reference Ohio EPA letter, 3 May 94, Subject: Notice of Deficiency, Amended Closure Plan Ravenna Army Ammunition Plant.
2. The local Ohio EPA representative, Mr. Murat Tukul, contacted this office to give advance notice that the revised plan submitted 11 Jul 94, was not considered acceptable by the regulators in Columbus, Ohio. They stated the closure was started in 1990 and should not be delayed any further. Mr. Tukul stated two (2) years is normally long enough to accomplish closures.
3. Mr. Tukul expects that the formal response will be mailed to RVAAP in approximately three weeks. It will probably state that a revised closure plan, not milestones, must be submitted within ten (10) or thirty (30) days.
4. Recommend a meeting be planned with the regulators in Columbus to explain why the Army cannot comply with their requirements. Failure to comply could result in a Notice of Violation (NOV).
5. POC is Mr. Robert J. Kasper, (216) 358-7311.

FOR THE COMMANDER:

//signed//
ROBERT J. KASPER
Commander's Representative

CF:
AMSMC-EQE (Mr. Whelove)
AMSMC-PAI-G/Team A (Mr. Bolton)
AMSMC-PDF (Mr. Tubbs)

RECEIVED

***** END OF MESSAGE *****

JUL 29 1994



State of Ohio Environmental Protection Agency

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

TO	10/18
ICR-COR	
✓ CONT ADM	
PROP ADM	
OACAS	
SECURITY	
✓ ERM + H	
RETURN FOR FILE	

George V. Voinovich
Governor

October 17, 1994

RE: AMENDED CLOSURE PLAN
RAVENNA ARMY AMMUNITION PLANT
OH5 210 020 736
#02-67-0209

CERTIFIED MAIL

Mr. Robert J. Kasper
Commander
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, Ohio 44266-9297

CONTRACTOR
FWD FOR
<input type="checkbox"/> Information
<input type="checkbox"/> Compliance as applicable
<input type="checkbox"/> Reply NLT

Dear Mr. Kasper:

On September 6, 1994, Ohio EPA received from Ravenna Army Ammunition Plant (RVAAP) a modified amended closure plan for a hazardous waste incinerator (deactivation furnace) located at 8451 State Route 5, Ravenna, Ohio.

This plan was submitted in response to the Ohio EPA's Notice of Deficiency (NOD) letter dated May 3, 1994 and pursuant to the Ohio Administrative Code (OAC) Rule 3745-66-12.

Based upon a review of the submittal, Ohio EPA has the following comments:

1. RVAAP's submittal found to be inadequate since the facility did not follow the editorial protocol provided in the Ohio EPA's NOD letter dated May 3, 1994. RVAAP's submittal included only the modified sections of the amended closure plan which is not acceptable. RVAAP must resubmit the complete modified closure plan which should be prepared in accordance with the following editorial protocol or convention:
 - i) Old Language is over-struck, but not obliterated.
 - ii) New Language is capitalized.



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Mr. Robert J. Kasper
Ravenna Army Ammunition Plant
Page Two

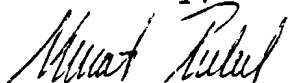
- iii) Page headers should indicate date of submission.
- iv) If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

- 2. RVAAP has failed to submit a modified closure plan within thirty (30) days of the receipt of the Ohio EPA's May 3, 1994 NOD letter. On July 12, 1994, RVAAP submitted a proposed schedule for closure plan submittal which was disapproved by the Ohio EPA on August 17, 1994.

Within fifteen (15) days of the receipt of this letter, RVAAP must submit a modified amended closure plan to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Manager, Data Management Section, P.O. Box 163669, Columbus Ohio 43266-3669. A copy should also be sent to: Murat Tukel, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Upon review of the resubmitted plan, Ohio EPA will prepare and issue a final action approving or modifying such plan. If you have any questions regarding this letter, please do not hesitate to contact me at (216) 963-1192.

Sincerely,



Murat Tukel
Division of Hazardous Waste
Management

MT/fwn

cc: Paul Anderson, DHWM, NEDO
Montee Suleiman, DHWM, CO
Tom Crepeau, DHWM, CO



RAVENNA ARMY AMMUNITION PLANT

8451 STATE ROUTE 5 • RAVENNA, OHIO 44266-9297

May 12, 1994

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

TO: Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087-1969
ATTN: Mr. Murat Tukel, DHWM

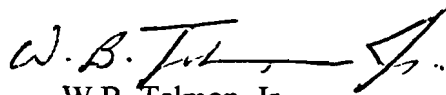
Subject: Schedule for Closure of RCRA Units, Ravenna Army Ammunition Plant
(Ref. Ohio EPA letter, 4/20/94)

Dear Mr. Tukel:

As requested in your letter of April 20, 1994, attached you will find a proposed schedule for closure of the RVAAP Open Burning Area, Open Demolition and Horse-Shoe Shaped Areas, and RCRA Storage Building 1601.

Please feel free to contact either myself, at (216) 358-7400, or Mr. Robert Kasper, Commander's Representative, at (216) 358-7311 if you have any questions or comments regarding the attached schedules for closure.

Sincerely,
Mason & Hanger-Silas Mason Co. Inc.


W.B. Talmon, Jr.
Site Manager

cc: W.B. Talmon, Jr.
Mr. Paul Anderson
Environmental File

PROPOSED TIMETABLE FOR THE OPEN BURNING AREA

- Identification of Funds - 15 July 94
- Contracting Actions for the Selection of the Contractor to Revise/Incorporate Comments on Existing Closure and Post Closure Plans - 15 Sept 94
- Submit Closure Plan and Post Closure Plan to Ohio EPA - 15 Jan 95
- Ohio EPA Approval to Closure Plan and Post Closure Plan
- Contracting Action for the Selection of a Contractor to Execute Approved Closure Plan - 180 Days after Approval of the Plans
- Characterization of RCRA Open Burning Site - 540 Days after Approval of the Closure Plan
- Ohio EPA Approval of the Characterization of the RCRA Site
- Remediation - Complete 360 Days after Approval of the Site Characterization
- Submittal of Closure Documentation - 180 Days after Remediation
- Approval of the Closure Documentation by the Ohio EPA
- If Post Closure Care is Needed Further Schedules will be Submitted for Agreement with the Ohio EPA

**PROPOSED TIMETABLE FOR THE OPEN DEMOLITION AND HORSE-SHOE
SHAPED AREA**

- Identification of Funds - 15 July 94
 - Contracting Actions for the Selection of the Contractor to Revise/Incorporate Comments on Existing Closure and Post Closure Plans - 15 Sept 94
 - Submit Closure and Post Closure Plan to Ohio EPA - 15 Jan 95
 - Ohio EPA Approval of Closure and Post-Closure Plan
 - Contracting Actions for the Selection of a Contractor to Execute Approved Closure Plan - 180 Days after Approval of Plans
 - Characterization of RCRA Open Demolition Site - 540 Days after Approval of the Closure Plan
 - Ohio EPA Approval of the Characterization of the RCRA Site
 - Remediation - Complete 720 Days after Approval of the Site Characterization
 - Submittal of Closure Documentation - 180 Days after Remediation
 - Approval of Closure Documentation by the Ohio EPA
 - If Post Closure Care is Needed Further Schedules will be Submitted for Agreement with the Ohio EPA
-

PROPOSED TIMETABLE FOR THE CLOSURE OF BUILDING 1601

- Identification of Funds - 15 July 94
 - Contracting Actions for the Selection of the Contractor to Write a Closure and Post Closure Plan for Building 1601 - 15 Sept 94
 - Submit Closure and Post Closure Plan to Ohio EPA - 15 Jan 95
 - Ohio EPA Approval of Closure and Post Closure Plan
 - Closure of Building 1601 - 275 Days after Approval of Closure Plan
 - Submittal of Closure Documentation - 90 Days after Closure
 - Approval of Closure by the Ohio EPA
 - If Post Closure Care is Needed Further Schedules will be Submitted for Agreement with the Ohio EPA
-