

Draft
Proposed Plan
RVAAP-03 Open Demolition Area #1
Former Ravenna Army Ammunition Plant
Portage and Trumbull Counties, Ohio

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Prepared for:



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14. ABSTRACT This PP presents the conclusions and recommendations from the RVAAP-03 ODA1 RI Report for soil, surface water, and sediment within RVAAP-03 ODA1 at Camp Ravenna. The AOC has no COCs that pose unacceptable risk. The preferred alternative at the ODA1 is NFA for soil, surface water, and sediment to attain Unrestricted (Residential) Land Use for soil, surface water, and sediment.					
15. SUBJECT TERMS PP = Proposed Plan, ODA1 = Open Demolition Area #1, RI = Remedial Investigation, AOC = Area of Concern, COCs = chemicals of concern, NFA = No Further Action, Unrestricted (Residential Land Use)					
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CONTRACTOR STATEMENT OF INDEPENDENT TECHNICAL REVIEW

Parsons has completed the Draft Proposed Plan for RVAAP-03 Open Demolition Area #1 at the Ravenna Army Ammunition Plant, Ravenna, Ohio. Notice is hereby given that an independent technical review has been conducted that is appropriate to the level of risk and complexity inherent in this project. During the independent technical review, compliance with established policy principles and procedures, utilizing justified and valid assumptions was verified. This included review of data quality objectives; technical assumptions, methods, procedures, and materials to be used; the appropriateness of data used and the level of data obtained; and the reasonableness of the results, including whether the product meets the customer's needs consistent with law and existing United States Corps of Engineers policy.

Independent Technical Reviewer:

Dan Griffiths, CPG
Technical Director



(Signature)

22 June 2017

(Date)

Plan Approver:

Edward Heyse, Ph.D., P.E.
Project Manager



(Signature)

22 June 2017

(Date)

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for RVAAP-03 Open Demolition Area #1
Ravenna Army Ammunition Plant Restoration Program
Camp Ravenna, Ohio**

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ARNG = Army National Guard

OHARNG = Ohio Army National Guard

RVAAP = Ravenna Army Ammunition Plant

USACE = United States Army Corps of Engineers

REIMS = Ravenna Environmental Information Management System

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36 **LIST OF ACRONYMS**

37 AOC Area of Concern

38 ARNG Army National Guard

39 bgs below ground surface

40 Camp Camp Ravenna Joint Military

41 Ravenna Training Center

42 CERCLA Comprehensive Environmental

43 Response, Compensation, and

44 Liability Act

45 CMCOPCs Contaminant Migration

46 Chemicals of Potential Concern

47 COCs Chemicals of Concern

48 COPECs Chemicals of Potential

49 Ecological Concern

50 COPCs Chemicals of Potential Concern

51 EPA Environmental Protection

52 Agency

53 FWCUGs Facility-wide Cleanup Goals

54 HHRA Human Health Risk

55 Assessment

56 HQ Hazard Quotient

57 IRA Interim Removal Action

58 ISM incremental sampling method

59 MEC munitions and explosives of

60 concern

61 MKM MKM Engineers, Inc.

62 MMRP Military Munitions Response

63 Program

64 NACA National Advisory Committee

65 for Aeronautics

66 NCP National Oil and Hazardous

67 Substances Pollution

68 Contingency Plan

69 NTA NACA Test Area

70 OB/OD open burn/open demolition

71 ODA1 Open Demolition Area #1

72 OE Ordnances and Explosives

73 OHARNG Ohio Army National Guard

74 PP Proposed Plan

75 RI Remedial Investigation

76 ROD Record of Decision

77 RSL Regional Screening Level

78 RVAAP Ravenna Army Ammunition

79 Plant

80 SAIC Science Applications

81 International Corporation

82 SARA Superfund Amendments and

83 Reauthorization Act

84 Shaw Shaw Environmental &

85 Infrastructure, Inc.

86 SLERA Screening Level Ecological

87 Risk Assessment

88 SRCs Site-related Chemicals

89 SVOC Semi-volatile Organic

90 Compound

91 TEC-Weston TEC-Weston Joint Venture

92 TNT trinitrotoluene

93 USACE United States Army Corps of

94 Engineers

1 **LIST OF ACRONYMS (Continued)**

- 2 USACHPPM U.S. Army Center for Health
3 Promotion and Preventive
4 Medicine
5 USAPHC US Army Public Health Center
6 U.S. Army United States Department of
7 the Army
8 USATHMA U.S. Army Toxic and
9 Hazardous Materials Agency
10 UXO unexploded ordnance

1 **1.0 INTRODUCTION**

2 This Proposed Plan (PP) presents the
3 conclusions and recommendations for soil,
4 surface water, and sediment within the
5 RVAAP-03 Open Demolition Area #1
6 (ODA1) area of concern (AOC) at the former
7 Ravenna Army Ammunition Plant (RVAAP).
8 The former RVAAP is now known as Camp
9 Ravenna Joint Military Training Center (Camp
10 Ravenna) and is located in Portage and
11 Trumbull Counties, Ohio (Figure 1). The
12 United States Department of the Army (U.S.
13 Army), in coordination with the Ohio
14 Environmental Protection Agency (EPA),
15 issues this PP to provide the public with
16 information to comment upon the selection of
17 an appropriate response action. The remedy
18 will be selected for RVAAP-03 ODA1 after all
19 comments submitted during the 30-day public
20 comment period are considered. Therefore, the
21 public is encouraged to review and comment
22 on the selected remedial action presented in
23 this PP.

24 The U.S. Army is issuing this PP as part of its
25 public participation responsibilities under
26 Section 117(a) of the Comprehensive
27 Environmental Response, Compensation, and
28 Liability Act (CERCLA) of 1980, as amended
29 by the Superfund Amendments and
30 Reauthorization Act (SARA) of 1986 and
31 Section 300.430(f)(2) of the National Oil and
32 Hazardous Substances Pollution Contingency
33 Plan (NCP) (40 *Code of Federal Regulations*
34 300). Selection and implementation of a
35 remedy will also be consistent with the
36 requirements of the Ohio EPA *Director's Final*
37 *Findings and Orders*, dated June 10, 2004
38 (Ohio EPA 2004).

39 This PP summarizes information that can be
40 found in greater detail in the *Remedial*
41 *Investigation (RI) Study for Soil, Surface*
42 *Water, and Sediment at RVAAP-03 Open*
43 *Demolition Area #1* (USACE 2017), and other
44 documents contained in the Administrative
45 Record file for the RVAAP-03 ODA1. No
46 Chemicals of Concern (COCs) were identified
47 in the human health risk for the Resident
48 Receptor for soil, surface water, or sediment.
49 The U.S. Army's preferred Alternative at

Public Comment Period:

Month DD, YYYY, to Month DD, YYYY

Public Meeting:

The Army will hold an open house and public meeting to present the conclusions and additional details presented in the *Remedial Investigation Study for Soil, Surface Water, and Sediment at RVAAP-03 Open Demolition Area #1* (United States Army Corps of Engineers [USACE] 2017). Oral and written comments will also be accepted at the meeting. The open house and public meeting are scheduled for PM, Month DD, YYYY, at the Ravenna High School Community Room, 6589 North Chestnut Street, Ravenna, Ohio 44266.

Information Repositories:

Information used in selecting the remedy is available for public review at the following locations:

Reed Memorial Library

167 East Main Street
Ravenna, Ohio 44266
(330) 296-2827

Hours of operation:

9 AM-9 PM Monday-Thursday
9 AM-6 PM Friday
9 AM-5 PM Saturday
1 PM-5 PM Sunday

Newton Falls Public Library

204 South Canal Street
Newton Falls, Ohio 44444
(330) 872-1282

Hours of operation:

10 AM-8 PM Monday-Thursday
9 AM-5 PM Friday and Saturday

Online

<http://www.rvaap.org/>

The **Administrative Record File**, containing information used in selecting the remedy, is available for public review at the following location:

Camp Ravenna Joint Military Training Center (former Ravenna Army Ammunition Plant)

Environmental Office
1438 State Route 534 SW
Newton Falls, Ohio 44444
(330) 872-8003

Note: Access is restricted to Camp Ravenna, but an appointment to review the Administrative Record File can be scheduled.

50 RVAAP-03 ODA1 is no further action for soil,
51 surface water, and sediment. Groundwater is

1 addressed under the Facility-Wide
2 Groundwater Monitoring Program RVAAP-66
3 Facility-Wide Groundwater. The U.S. Army
4 encourages the public to review the site
5 background documents to gain a more
6 comprehensive understanding of the AOC,
7 activities that have been conducted to date, and
8 the rationale for the preferred Alternative.

9 **2.0 RVAAP DESCRIPTION AND** 10 **BACKGROUND**

11 Camp Ravenna, located in northeastern Ohio
12 within Portage and Trumbull counties, is
13 approximately three (3) miles east/northeast of
14 the City of Ravenna and one (1) mile
15 north/northwest of the Village of Newton Falls.
16 The facility is federally owned, approximately
17 11 miles long, and 3.5 miles wide. The facility
18 is bounded by State Route 5, the Michael J.
19 Kirwan Reservoir, and the CSX System
20 Railroad to the south; Garret, McCormick, and
21 Berry Roads to the west; the Norfolk Southern
22 Railroad to the north; and State Route 534 to
23 the east. In addition, the facility is surrounded
24 by the communities of Windham, Garrettsville,
25 Charlestown, and Wayland.

26 As of September 2013, administrative
27 accountability for the entire 21,683-acre
28 facility has been transferred to the United
29 States Property and Fiscal Officer for Ohio and
30 the property subsequently licensed to the Ohio
31 Army National Guard (OHARNG) for use as a
32 military training site, Camp Ravenna.

33 **3.0 RVAAP-03 OPEN DEMOLITION** 34 **AREA #1 DESCRIPTION**

35 RVAAP-03 ODA1 is located in the
36 southwestern portion of the former RVAAP,
37 north of Hinkley Creek, within the southern
38 portion of RVAAP-38 National Advisory
39 Committee for Aeronautics (NACA) Test Area
40 (NTA) AOC (Figure 2). RVAAP-03 ODA1
41 was used from 1941 to 1949 primarily for the
42 thermal destruction of munitions, explosives,
43 and associated materials through the operation
44 of open burn/open demolition (OB/OD)
45 practices. The OB/OD area within RVAAP-03
46 ODA1 was surrounded by an oval shaped

47 earthen berm (Figure 3).

48 In addition to RVAAP-03 ODA1 being used
49 for OB/OD operations, the surrounding area
50 adjacent to RVAAP-03 ODA1 was used to
51 stage aircraft for NTA operations. The NTA
52 was constructed and used between 1947 and
53 1953. Aircraft have been observed to be parked
54 atop the earthen berm and areas east of the
55 berm in historic aerial photographs from 1952
56 (SAIC 2001). The berms around the OB/OD
57 area have since been removed.

58 During the 2001 Phase I RI (SAIC 2001), areas
59 outside of the berm contained shrapnel, fuzes,
60 booster cups, and other debris on the soil
61 surface. The occurrence of these materials on
62 the ground surface outside the OB/OD area
63 suggested that kickouts and shrapnel were
64 generated during thermal destruction of
65 ammunition. Historical operations also
66 indicated that, when congested with debris,
67 burning areas were cleared using heavy
68 equipment by pushing the debris to the
69 periphery of the area (SAIC 2001).

70 Slag is present in fill material around the
71 former berm and adjacent NTA runway. This
72 aluminum-rich slag (the use of which was
73 widespread throughout the former
74 RVAAP/Camp Ravenna) may account for
75 some elevated concentrations of metals
76 (especially aluminum, barium, beryllium, and
77 manganese). However, Ohio Administrative
78 Code 3745-2701(B)40 specifically exempts
79 slag as a solid waste (Ohio EPA 2000).

80 The OHARNG does not currently use
81 RVAAP-03 ODA1 for training purposes due to
82 the concerns related to potential munitions and
83 explosives of concern (MEC) hazards.
84 However, the OHARNG uses the surrounding
85 adjacent NTA for training purposes.

86 The following environmental investigations
87 have been completed for RVAAP-03 ODA1:

- 88 - *Ravenna Army Ammunition Plant Water*
89 *Quality Surveillance Program*
90 *(USATHMA 1980–1992).*
- 91 - *Ravenna Army Ammunition Plant Water*
92 *Quality Surveillance Program*
93 *(USATHMA 1980–1992).*
- 94 - *Final Preliminary Assessment for*

- 1 *Ravenna Army Ammunition Plant,*
- 2 *Ravenna, Ohio* (U.S. Army Center for
- 3 Health Promotion and Preventive
- 4 Maintenance [USACHPPM; now known
- 5 as United States Army Public Health
- 6 Center; USAPHC] 1996).
- 7 - *Phase I Remedial Investigation Report for*
- 8 *Demolition Area #1 at the Ravenna Army*
- 9 *Ammunition Plant, Ohio* (SAIC 2001).
- 10 - *Final Ordnance and Explosives*
- 11 *(OE)/Unexploded Ordnance (UXO)*
- 12 *Removal and Interim Removal Action*
- 13 *(IRA) Report for the Open Demolition*
- 14 *Area #1* (MKM 2004).
- 15 - *Final Facility-Wide Biological and Water*
- 16 *Quality Study 2003* (USACE 2005b).
- 17 - *Final Digital Geophysical Mapping*
- 18 *Report for the RVAAP-34 Sand Creek*
- 19 *Disposal Road Landfill, RVAAP-03 Open*
- 20 *Demolition Area #1, and RVAAP-28*
- 21 *Mustard Agent Burial Site Version 1.0*
- 22 (Shaw 2011)
- 23 - *Remedial Investigation Study for Soil,*
- 24 *Surface Water, and Sediment at RVAAP-*
- 25 *03 Open Demolition Area #1* (Phase II,
- 26 USACE 2017).

27 **4.0 RVAAP-03 OPEN DEMOLITION**
 28 **AREA #1 CHARACTERISTICS**

29 The AOC characteristics, nature and extent of
 30 contamination, and conceptual site model are
 31 based on the investigations conducted from
 32 1996 through 2017. RVAAP-03 ODA1 covers
 33 approximately 6 acres and consisted of an oval
 34 OB/OD area, which was surrounded by a 25
 35 foot wide by 1.5 foot tall earthen berm, and a
 36 plane storage area previously located on the
 37 south side of the site (Figure 3). The berms
 38 around the OB/OD area have been removed,
 39 and a low area immediately south and east of
 40 the former berm collects runoff during rainfall
 41 events (USACE 2017).

42 Currently, the AOC occupies an open parcel of
 43 land that is bounded to the south, east, and west
 44 by woodlands. Topography across RVAAP-03
 45 ODA1 is relatively flat with little change in
 46 elevation. The elevation at RVAAP-03 ODA1
 47 is approximately 1,085 feet above mean sea
 48 level. The AOC is slightly elevated as

49 compared to its immediate surroundings, and
 50 surface drainage outside the former berm is to
 51 the east, west, and south. Drainage from within
 52 the former bermed OB/OD area is south via a
 53 culvert towards a shallow ditch, which
 54 ultimately discharges at ground surface within
 55 the Hinkley Creek drainage area.

56 Soil at RVAAP-03 ODA1 consist of the
 57 Fitchville silt loam series. This series exhibit 2
 58 to 6% slopes, is somewhat poorly drained, and
 59 has low permeability. The surficial geology at
 60 RVAAP-03 ODA1 consists of the Lavery Till,
 61 which is a mix of approximately 28% sand and
 62 30% clay, but percentages can vary. RVAAP-
 63 03 ODA1 lies within the Sharon Sandstone
 64 Conglomerate. However, bedrock was not
 65 encountered in any of the Phase II RI borings;
 66 therefore, depth to bedrock is unknown in the
 67 AOC (USACE, 2017).

68 No monitoring wells have been installed as part
 69 of the 2017 (Phase II) RI, and site-specific
 70 groundwater data is not available at RVAAP-
 71 03 ODA1. However, there are monitoring
 72 wells screened in the unconsolidated aquifer in
 73 the NTA AOC, located adjacent to RVAAP-03
 74 ODA1, and groundwater flow in this area is
 75 southerly (TEC-Weston Joint Venture [TEC-
 76 Weston] 2017). One groundwater grab sample
 77 (DA1-27-GW) was collected under the Phase I
 78 RI as a direct-push boring, and the depth to the
 79 water table was measured at approximately 16
 80 feet below ground surface (bgs). Groundwater
 81 was encountered in a majority of the Phase II
 82 RI direct-push soil borings at RVAAP-03
 83 ODA1. The depth to groundwater at these
 84 borings ranged from 4 to 11 feet bgs, with an
 85 average groundwater depth of approximately 6
 86 feet bgs.

87 Data collected during the Phase I RI indicated
 88 that sediment and surface water in Hinkley
 89 Creek had not been contaminated as a result of
 90 former operations at RVAAP-03 ODA1;
 91 therefore, sediment and surface water were not
 92 evaluated further in the Final Phase II RI
 93 (USACE 2017).

94 Phase I and II RI data were used to determine
 95 site-related chemicals (SRCs). SRCs were
 96 selected by consideration of background
 97 concentrations, essential nutrients, and

1 frequency of detection. A total of 23 SRCs
2 were identified in surface soil (0-1 foot bgs)
3 and 33 SRCs were identified in subsurface soil
4 (greater than 1 foot bgs) (USACE 2017).

5 The potential for soil contaminants to impact
6 groundwater was evaluated in a fate and
7 transport evaluation presented in the Phase II
8 RI Report (USACE 2017). The fate and
9 transport evaluation included modeling and
10 comparing the model results to background
11 concentrations and maximum contaminant
12 levels/EPA RSLs. The model prediction
13 identified the maximum concentrations of the
14 SRCs expected in groundwater under RVAAP-
15 03 ODA1. Modeling evaluated the potential for
16 contaminants to leach from soil to groundwater
17 beneath the AOC and eventually impact
18 Hinckley Creek.

19 The conclusions of the fate and transport
20 leaching analysis and modeling are that some
21 of the SRCs in soil may leach to groundwater
22 beneath the AOC. The final list of Contaminant
23 Migration Chemicals of Potential Concern
24 (CMCOPCs) for RVAAP-03 ODA1 are
25 presented below:

- 26 - Two explosives and propellants (2,4,6-
27 trinitrotoluene (TNT) and 2-amino-4,6-
28 dinitrotoluene)
- 29 - One semi-volatile organic compound
30 (SVOC) (isophorone)
- 31 - Ten metals (antimony, arsenic, barium,
32 cadmium, chromium, lead, mercury,
33 selenium, silver, and thallium)

34 A single groundwater sample was collected
35 during the Phase I RI using direct-push boring
36 techniques. Results from this sample did not
37 indicate any impact to groundwater from
38 RVAAP-03 ODA1 activities (USACE 2017).
39 Groundwater is addressed under the Facility-
40 Wide Groundwater Monitoring Program
41 RVAAP-66 Facility-Wide Groundwater.

42 **5.0 SCOPE AND ROLE OF** 43 **RESPONSE ACTION**

44 The AOC is not currently used for military
45 training activities; however, the OHARNG
46 uses the surrounding adjacent NTA for training
47 purposes. The OHARNG projected future

48 Land Use for RVAAP-03 ODA1 is Military
49 Training Land Use. The Representative
50 Receptor is the Residential Receptor for
51 Unrestricted (Residential) Land Use. Only the
52 Unrestricted (Residential) Land Use was
53 evaluated fully and discussed in the Human
54 Health Risk Assessment (HHRA) because it is
55 considered protective for all categories of Land
56 Use at Camp Ravenna, such as Military
57 Training Land Use. The response action
58 evaluated Alternatives to attain Unrestricted
59 (Residential) Land Use for soil, surface water,
60 and sediment.

61 Groundwater is addressed under the Facility-
62 Wide Groundwater Monitoring Program
63 RVAAP-66 Facility-Wide Groundwater as a
64 separate decision. However, the selected
65 remedy for soil at RVAAP-03 ODA1 must also
66 be protective of groundwater.

67 **6.0 SUMMARY OF HUMAN AND** 68 **ECOLOGICAL RISKS**

69 **6.1 Human Health Risk Assessment**

70 A HHRA was performed during the Phase II RI
71 to identify COCs and provide a risk
72 management evaluation to determine if
73 remediation is required under CERCLA based
74 on potential risks to human receptors. The
75 exposure media and depths evaluated in the
76 HHRA for the Resident Receptor (Adult and
77 Child) were surface soil (0-1 foot bgs) and
78 subsurface soil (1-13 feet bgs). The evaluation
79 of surface water and sediment was not
80 necessary in the HHRA as no SRCs were
81 identified. The Phase I RI (SAIC 2001)
82 concluded that surface water and sediment
83 were not impacted from RVAAP-03 ODA1
84 operations.

85 Phase I and II RI data were used to determine
86 SRCs, chemicals of potential concern
87 (COPCs), and COCs. The final list of COPCs
88 includes those SRCs where sample results
89 from any depth exceeded the May 2016 EPA
90 Residential or Industrial Regional Screening
91 Levels (RSLs) for target cancer risk level of 1
92 $\times 10^{-6}$ or non-carcinogenic target hazard
93 quotient (HQ) of 0.1. Because the FWCUGs
94 were not updated at the time the HHRA was

1 written, the May 2016 Residential RSLs were
2 used for the Resident Receptor. The
3 determination of COPCs and COCs in the risk
4 assessment was conducted in accordance with
5 the RVAAP *Final Position Paper for the*
6 *Application and Use of Facility-Wide Cleanup*
7 *Goals* (USACE 2012) and modified to reflect
8 changes in the Risk Assessment Technical
9 Memo. The Unrestricted (Residential) Land
10 Use is required under CERCLA and is outlined
11 in the *Facility-Wide Human Health Risk*
12 *Assessor Manual* (USACE 2005a).

13 The COPCs were determined for the
14 Residential Receptor for expected depth of
15 exposure; therefore, discrete and incremental
16 sampling method (ISM) samples were
17 considered separately. The COPCs identified
18 for the Resident Receptor in RVAAP-03
19 ODA1 are presented below:

- 20 - Surface soil
 - 21 o ISM data - Cobalt and 2,4,6-TNT
 - 22 o Discrete data - None
- 23 - Subsurface soil
 - 24 o Compositing discrete (ISM) data -
 - 25 2,4,6-TNT
 - 26 o Discrete data - aluminum, antimony,
 - 27 arsenic, cadmium, copper, lead,
 - 28 silver, and 2,4,6-TNT

29 A COPC was identified as a COC by screening
30 its Exposure Point Concentration to the EPA
31 Residential RSL of 10^{-5} cancer risk level for
32 carcinogenic effects and HQ equal to 1 for
33 noncarcinogenic effects. The Sum of Ratios for
34 all carcinogens and all non-carcinogens that
35 may affect the same organ must be less than or
36 equal to 1.0 as well. If the Sum of Ratios for all
37 carcinogens and all non-carcinogens (that may
38 affect the same organ or do not have a specific
39 target organ identified) were greater than 1,
40 then the chemicals contributing at least 10% to
41 the sum were considered COCs.

42 The HHRA did not identify COCs from
43 previous Army activities requiring remediation
44 under CERCLA to be protective of the
45 Resident Receptor.

46 **6.2 Screening-Level Ecological Risk**

47 **Assessment**

48 The purpose of the Screening Level Ecological

49 Risk Assessment (SLERA) performed during
50 the Phase II RI was to evaluate the potential for
51 adverse ecological effects posed to ecological
52 receptors from chemical constituents detected
53 in surface soil from RVAAP-03 ODA1. The
54 evaluation of surface water and sediment was
55 not necessary as the Phase I RI (SAIC 2001)
56 deemed surface water/sediment not to be
57 impacted as a result of historical RVAAP-03
58 ODA1 operations. Chemicals of potential
59 ecological concern (COPECs) are analytes
60 whose concentrations are great enough to pose
61 potential adverse effects to ecological
62 receptors.

63 The SLERA included characterizing the
64 ecological communities in the vicinity of the
65 site, determining the particular contaminants
66 present, identifying pathways for receptor
67 exposure, and estimating the likelihood of
68 potential adverse effects to identified
69 receptors. Data from the ISM samples and
70 discrete samples were analyzed separately, and
71 not combined in the SLERA. Only surface soil
72 (0 to 1 foot bgs sampling interval) samples
73 were used in the SLERA because most
74 ecological exposure occurs within the top 1
75 foot of soil. HQs less than 10 are considered to
76 represent a low potential for environmental
77 effects, HQs from 10 up to, but less than 100
78 are considered to represent a significant
79 potential that effects could result from greater
80 exposure, and HQs greater than 100 represent
81 the highest potential for expected effects.

82 For the discrete samples, all five identified
83 COPECs (cadmium, cobalt, copper, mercury,
84 and zinc) were detected at relatively low
85 concentrations that, with the exception of
86 mercury, approximated their background
87 screening values, or ecological screening
88 values, or both. Mercury had an elevated HQ
89 value of over 100, which is attributable to its
90 extremely conservative ecological screening
91 value. However, the mean concentration of
92 mercury in discrete samples was lower than its
93 background screening value. Also, when a
94 more realistic ecological screening value was
95 used, the mercury HQ was less than one.

96 Similarly, although 14 chemicals were
97 identified as COPECs (nine inorganic

1 chemicals, two explosives compounds, three
2 pesticides, and one SVOC) in the ISM surface
3 soil samples, none appear to warrant further
4 investigation for ecological purposes alone.
5 Eight of the nine metal COPECs had HQs that
6 did not exceed 10, which, given the
7 conservative nature of the Level II Screening,
8 suggests that they are not present at sufficiently
9 high concentrations to warrant concern. The
10 HQ for mercury exceeded 100, but this HQ is
11 likely overestimated due to the conservative
12 ecological screening value that was used for
13 this SLERA. Of the six organic chemicals
14 identified as COPECs, only 2,4,6-TNT had an
15 HQ slightly greater than one; the other five
16 chemicals were selected as COPECs either
17 because they lacked an ecological screening
18 value or because they are persistent,
19 bioaccumulative, and toxic compounds that
20 were detected at low concentrations below
21 their ecological screening values. However,
22 given their low concentrations, it is unlikely
23 that these chemicals have the potential to cause
24 adverse ecological effects to populations.

25 Because the terrestrial area evaluated for
26 RVAAP-03 ODA1 is less than one acre in size,
27 and the Phase II Level Screening in the SLERA
28 uses highly conservative assumptions, it is
29 unlikely that exposure to the surface soil
30 COPECs identified in the SLERA would
31 adversely impact populations of ecological
32 receptors at RVAAP-03 ODA1. Therefore, no
33 further investigation (e.g., Level III Baseline
34 Ecological Risk Assessment) or removal
35 action is considered necessary at RVAAP-03
36 ODA1 for the protection of ecological
37 receptors.

38 **7.0 CONCLUSIONS**

39 Based on results of the Phase II RI, and in
40 particular the HHRA and the SLERA, no
41 additional remedial actions are required for this
42 AOC. Further investigation is not warranted
43 for the following reasons: (1) the nature and
44 extent of chemicals detected in the media (soil,
45 surface water, and sediment) at the AOC has
46 been characterized; (2) no COCs for human
47 health were identified at the AOC; and (3) the
48 SLERA ended at a Level II assessment and no

49 further investigation or action was
50 recommended. Therefore, No Further Action is
51 required for soil, sediment and surface water at
52 RVAAP-03 ODA1 and Unrestricted
53 (Residential) Land Use is attained for this
54 AOC. Groundwater is addressed under the
55 Facility-Wide Groundwater Monitoring
56 Program RVAAP-66 Facility-Wide
57 Groundwater.

58 RVAAP-03 ODA1 was identified in the real
59 property records and the OHARNG Federal
60 Installation Support Plan as an operational
61 (active) range. Under this classification,
62 RVAAP-03 ODA1 is not eligible to be
63 included in the Military Munitions Response
64 Program (MMRP). Because it is part of the
65 maneuver area which is an operational and
66 active range, the additional MEC clearance
67 will be completed by the OHARNG. It is
68 believed that little, if any, MEC remains, but
69 this cannot be confirmed until a complete MEC
70 clearance is conducted. Therefore, the AOC
71 will be properly managed and maintained
72 according to Army policy (USACE 2017).

73 This recommendation is not a final decision.
74 The U.S. Army, in coordination with Ohio
75 EPA, will select the remedy for RVAAP-03
76 ODA1 after reviewing and considering all
77 comments submitted during the 30-day public
78 comment period.

79 **8.0 COMMUNITY PARTICIPATION**

80 **8.1 Community Participation**

81 Public participation is an important component
82 of the remedy selection. The U.S. Army, in
83 coordination with Ohio EPA, is soliciting input
84 from the community on the preferred
85 Alternative. The comment period extends from
86 **Month DD, YYYY to Month DD, YYYY**. This
87 period includes a public meeting at which the
88 U.S. Army will present this PP. The U.S. Army
89 will accept oral and written comments at this
90 meeting.

91 **8.2 Public Comment Period**

92 The 30-day comment period is from **Month**
93 **DD, YYYY to Month DD, YYYY**, and
94 provides an opportunity for public

1 involvement in the decision-making process
2 for the proposed action. The public is
3 encouraged to review and comment on this PP.

4 All public comments will be considered by the
5 U.S. Army and Ohio EPA before selecting a
6 remedy. During the comment period, the
7 public is encouraged to review documents
8 pertinent to RVAAP-03 ODA1.

9 This information is available at the Information
10 Repository and online at www.rvaap.org. To
11 obtain further information, contact Kathryn
12 Tait of the Camp Ravenna Environmental
13 Office at kathryn.s.tait.nfg@mail.mil.

14 **8.3 Written Comments**

15 If the public would like to comment in writing
16 on this PP or other relevant issues, please
17 deliver comments to the U.S. Army at the
18 public meeting or mail written comments
19 (postmarked no later than Month DD, YYYY).

POINTS OF CONTACT FOR WRITTEN COMMENTS

Mailing Address:

Camp Ravenna Joint Military Training Center
Environmental Office
Attn: Kathryn Tait
1438 State Route 534 SW
Newton Falls, Ohio 44444

Email Address:
kathryn.s.tait.nfg@mail.mil

20 **8.4 Public Meeting**

21 The U.S. Army will hold an open house and
22 public meeting on this PP on Month DD,
23 YYYY, at PM, in the Ravenna High School
24 Community Room, 6589 North Chestnut
25 Street, Ravenna, Ohio 44266 to accept
26 comments.

27 This meeting will provide an opportunity for
28 the public to comment on the proposed action.
29 Comments made at the meeting will be
30 transcribed.

31 **8.5 Army Review of Public Comments**

32 The U.S. Army will review the public's
33 comments as part of the process in reaching a
34 final decision for the most appropriate action to

35 be taken. The Responsiveness Summary, a
36 document that summarizes the U.S. Army's
37 responses to comments received during the
38 public comment period, will be included in the
39 Record of Decision (ROD). The U.S. Army's
40 final choice of action will be documented in the
41 ROD.

ADMINISTRATIVE RECORD FILE

**Camp Ravenna Joint Military Training Center
(former Ravenna Army Ammunition Plant)**

Environmental Office
1438 State Route 534 SW
Newton Falls, Ohio 44444
(330) 872-8003

Note: Access is restricted to Camp Ravenna, but an
appointment to review the Administrative Record File
can be scheduled.

42

INFORMATION REPOSITORIES

Reed Memorial Library

167 East Main Street
Ravenna, Ohio 44266
(330) 296-2827

Hours of operation:

9 AM-9 PM Monday-Thursday
9 AM-6 PM Friday
9 AM-5 PM Saturday
1 PM-5 PM Sunday

Newton Falls Public Library

204 South Canal Street
Newton Falls, Ohio 44444
(330) 872-1282

Hours of operation:

10 AM-8 PM Monday-Thursday
9 AM-5 PM Friday and Saturday

Online

<http://www.rvaap.org/>

43

GLOSSARY OF TERMS

44 **Administrative Record:** a collection of
45 documents, typically reports and
46 correspondence, generated during site
47 investigation and remedial activities.

1 Information in the Administrative Record
2 represents the information used to select
3 preferred Alternatives.

4 **Comprehensive Environmental Response
5 Compensation, and Liability Act
6 (CERCLA):** a federal law passed in 1980,
7 commonly referred to as the Superfund
8 Program. It provides liability, compensation,
9 cleanup, and emergency response in
10 connection with the cleanup of inactive
11 hazardous substance release sites that endanger
12 public health or the environment.

13 **Contaminant Migration Chemical of
14 Potential Concern (CMCOPC):** a chemical
15 substance specific to an area of concern that
16 potentially poses significant potential to leach
17 to groundwater at a concentration above
18 human health risks goals. CMCOPCs are
19 typically further evaluated for remedial action.

20 **Chemical of Concern (COC):** a chemical
21 substance specific to an area of concern that
22 potentially poses significant human health or
23 ecological risks. COCs are typically further
24 evaluated for remedial action.

25 **Chemical of Potential Concern (COPC):** a
26 chemical substance specific to an area of
27 concern that potentially poses human health
28 risks and requires further evaluation in the RI.
29 COPCs are typically not evaluated for remedial
30 action.

31 **Chemical of Potential Ecological Concern
32 (COPEC):** a chemical substance specific to an
33 area of concern that potentially poses
34 ecological risks and requires further evaluation
35 in the RI. Chemicals of Potential Ecological
36 Concern are typically not evaluated for
37 remedial action.

38 **Ecological Receptor:** a plant, animal, or
39 habitat exposed to an adverse condition.

40 **Hazard Quotient (HQ):** the ratio of the
41 potential exposure to a substance and the level
42 at which no adverse effects are expected.

43 **Human Receptor:** a hypothetical person,
44 based on current or potential future Land Use,
45 who may be exposed to an adverse condition.
46 For example, the National Guard Trainee is
47 considered the hypothetical person when

48 evaluating Military Training Land Use at the
49 former RVAAP.

50 **National Oil and Hazardous Substances
51 Pollution Contingency Plan (NCP):** the set of
52 regulations that implement CERCLA and
53 address responses to hazardous substances and
54 pollutants or contaminants.

55 **Record of Decision (ROD):** a legal record
56 signed that describes the cleanup action or
57 remedy selected for a site, the basis for
58 selecting that remedy, public comments, and
59 responses to comments.

60 **Remedial Investigation (RI):** CERCLA
61 investigation that involves sampling
62 environmental media, such as air, soil, and
63 water, to determine the nature and extent of
64 contamination and to calculate human health
65 and environmental risks that result from the
66 contamination.

67 **Responsiveness Summary:** a section of the
68 ROD that documents and responds to written
69 and oral comments received from the public
70 about the Proposed Plan.

71 **Risk Assessment:** an evaluation that
72 determines potential harmful effects, or lack
73 thereof, posed to human health and the
74 environment due to exposure to chemicals
75 found at a CERCLA site.

76 **Sum of Ratios:** an approach to account for the
77 potential additive effects from exposure to
78 multiple chemicals or exposure to multiple
79 chemicals that can cause the same effect (e.g.,
80 cancer) or affect the same target organ. The
81 Sum of Ratios approach compares the
82 chemical concentration (e.g., 95 % upper
83 confidence limit of the mean concentration,
84 ISM result or concentration in confirmation
85 samples) of the COPC to the individual
86 cleanup goal to determine a ratio.

87 **Unrestricted (Residential) Land Use:** A
88 Land Use defined for the former RVAAP
89 restoration that is considered protective for all
90 three Land Uses at Camp Ravenna Joint
91 Military Training Center (Camp Ravenna). If
92 an AOC meets the requirements for
93 Unrestricted (Residential) Land Use, then the
94 AOC can also be used for Military Training

1 and Commercial/Industrial purposes.

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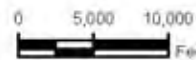
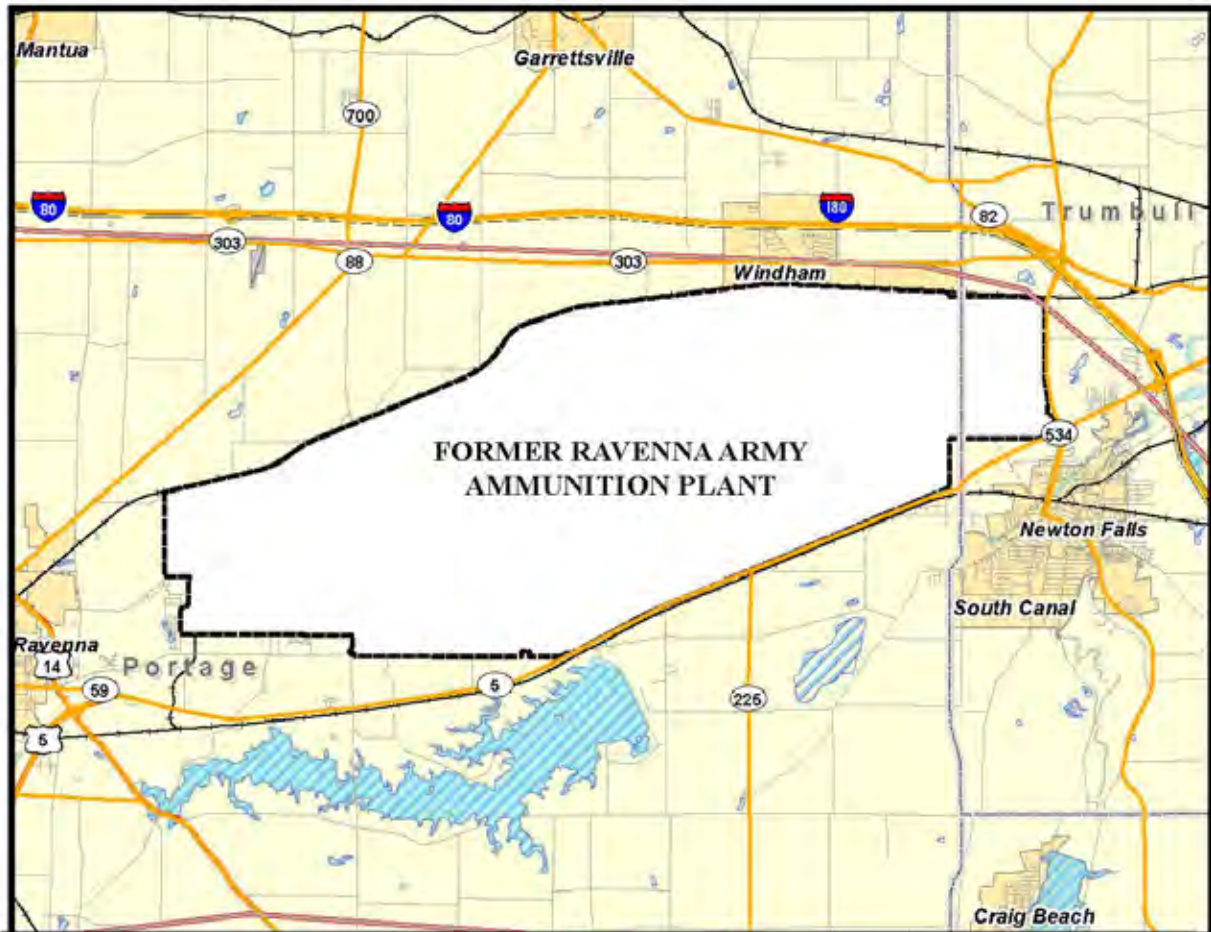
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FIGURES

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NOTES & SOURCES

Map Coordinates: WGS 84, UTM Zone 17N in Meters
The scale is for upper map only.

PARSONS

Former Ravenna Army
Ammunition Plant, Portage
and Trumbull Counties, Ohio

DESIGNED BY:	BT	<p align="center">Figure 1 General Location and Orientation of Former Ravenna Army Ammunition Plant/Camp Ravenna Proposed Plan</p>	
DRAWN BY:	LH		
REVIEWED BY:	EH	SCALE:	As Shown
DATE:	June 2017	PROJECT NUMBER:	640030.0005.110051
FIGURE NUMBER:	1	FIGURE SHEETS:	1
FILE:	Ravenna_AOC		

Figure 1 General Location and Orientation of Former RVAPP/Camp Ravenna

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PARSONS		Former Ravenna Army Ammunition Plant, Portage and Trumbull Counties, Ohio	
		Figure 2 RVAAP-03 Open Demolition Area #1 Location Proposed Plan	
DESIGNED BY: BT	SCALE: As Shown	PROJECT NUMBER: 110051.05000	
DRAWN BY: LH	DATE: June 2017	FIGURE NUMBER:	2
CHECKED BY: EH	FILE: Ravenna_AOC		
SUBMITTED BY: EH			

Figure 2 RVAAP-03 Open Demolition Area #1 Location

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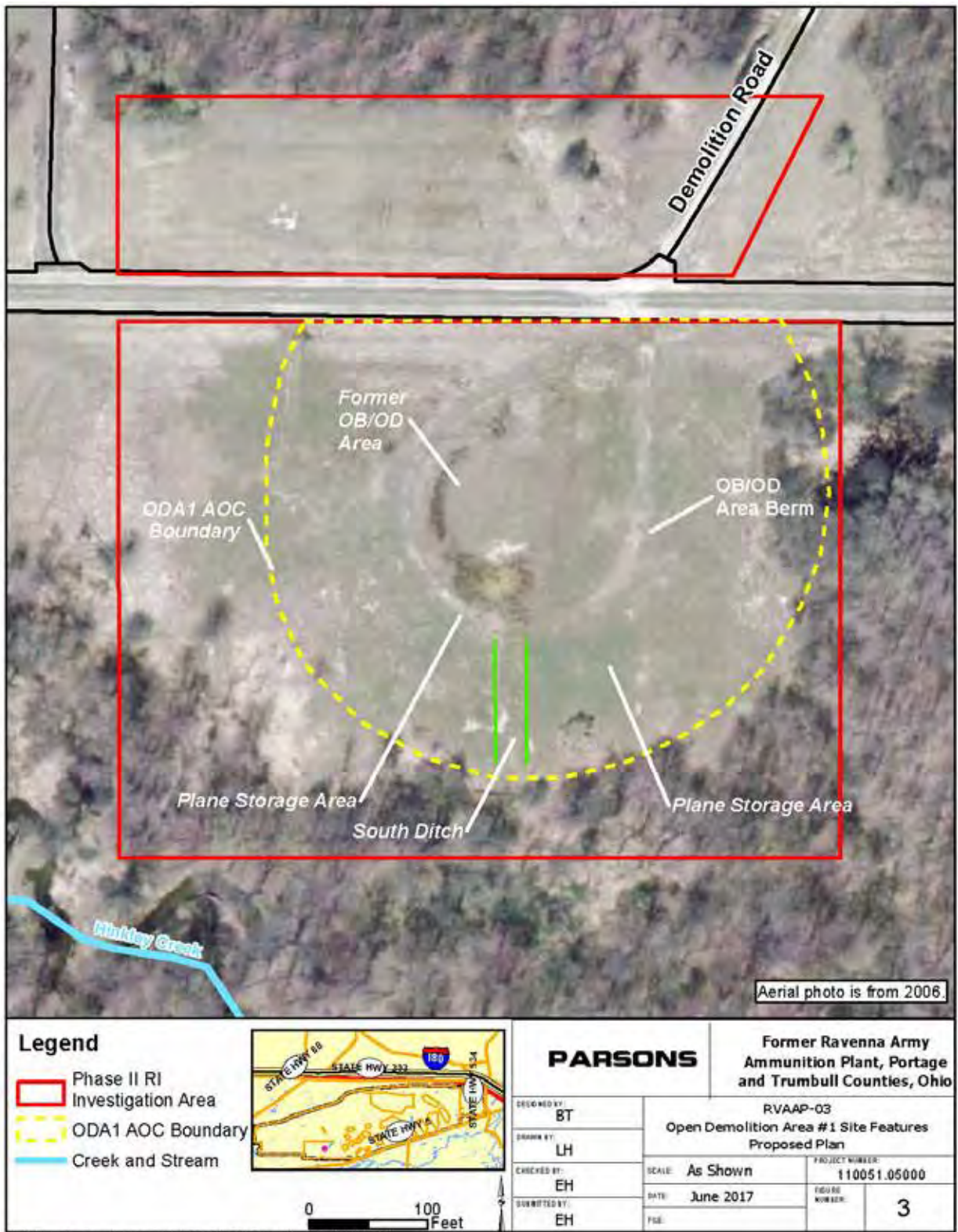


Figure 3 RVAAP-03 Open Demolition Area #1 Site Features

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Figure 4 RVAAP-03 Open Demolition Area #1 Sample Locations

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