



NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

July 1, 2019

Ohio Environmental Protection Agency, DERR-NEDO
Attn: Mr. Kevin Palombo
2110 East Aurora Road
Twinsburg, OH 44087-1924

Subject: Ravenna Army Ammunition Plant Restoration Program
DRAFT Remedial Action Completion Report for Soil at RVAAP-51 Dump Along
Paris-Windham Road
Camp James A. Garfield/former RVAAP, Portage/Trumbull Counties, Ohio
(Ohio EPA ID No. 267-000859-019)

Dear Mr. Palombo:

Enclosed for your review and comments are one (1) hard copy and one (1) electronic copy of the *DRAFT Remedial Action Completion Report for Soil at RVAAP-51 Dump Along Paris-Windham Road*. This Remedial Action Completion (RAC) report was prepared to document certain remedial actions taken in accordance with the *Final Remedial Design for Soil at RVAAP-51 Dump Along Paris-Windham Road* (RD).

A general location map of the former RVAAP facility is attached as Figure 1 – Location of Areas of Concern (AOCs) at RVAAP/Camp Ravenna.

Remedial Activities

The following activities were implemented in accordance with the approved RD:

- Signs and boundary markers (Seibert stakes) posted along the AOC perimeter,

Signs and Boundary Markers -

Prior to implementation of the RD, eleven (11) Seibert markers and nine (9) “Unauthorized Personnel” signs were in place around the AOC. The eleven (11) Seibert markers remain in place around the AOC. Four (4) of the “Unauthorized Personnel” signs were replaced with “Danger, Asbestos Waste Disposal Site” signs on May 2, 2019. The signs and Seibert Stakes are placed around the approximate limits of the former dump area in a generally alternating pattern ranging from 10 to 60 feet apart, with the majority being placed 30 to 50 feet apart. The Seibert markers, “Unauthorized Personnel” and “Danger, Asbestos Waste Disposal Site” signs are located around the AOC as shown on attached Figure 2. The “Danger, Asbestos Waste Disposal Site” warning signs meet the requirements of Ohio Administrative Code (OAC) 3745-20-07-(B)(1)(b). Photographs of the Seibert markers, “Unauthorized Personnel” warning signs, and “Danger, Asbestos Waste Disposal Site” warning signs are attached.

Seibert stakes are used in military training areas to mark off-limit or sensitive areas. Seibert stakes consist of 2” PVC Schedule 40 (2-3/8” outer diameter with 2” inner diameter) by 16” long pipe wrapped with bands of white, yellow and red Hi-Intensity prismatic sheeting. One side of

the stake has a black band that faces towards the protected area. The Seibert stakes are placed around the perimeter of the protected area. A photograph of a Seibert stake is shown on Figure 2.

The "Unauthorized Personnel" warning signs in place at the AOC read:

**DANGER
UNAUTHORIZED
PERSONNEL
KEEP OUT**

The "Asbestos Waste Disposal Site" warning signs in place at the AOC read:

**DANGER
ASBESTOS WASTE
DISPOSAL SITE
NO DIGGING
DO NOT CREATE DUST
BREATHING ASBESTOS
IS HAZARDOUS TO YOUR
HEALTH**

Conclusions

This RAC documents the remedial activities that were completed for the selected remedy for soil at RVAAP-51 as specified in the *Final Record of Decision for Soil, Sediment, and Surface Water at RVAAP-51 Dump Along Paris-Windham Road* (ROD). The remedial actions described in the RAC attained the remedial action objectives established in the ROD. The Army National Guard (ARNG) will manage future land use as Restricted access due to residual asbestos and Chemicals of Concern, and will implement Land Use Controls (LUCs) as described in the RD. Additionally, ARNG will conduct CERCLA five-year reviews.

This RAC report was prepared in support of the Environmental Program Support Services project at the former Ravenna Army Ammunition Plant (RVAAP, currently known as Camp James A. Garfield) in Portage and Trumbull counties, Ohio. This document was prepared for the US Army Corps of Engineers (USACE) – Louisville District by Chenega Tri-Services Contract No. W912QR-18C-0013.

Please contact the undersigned at (703) 607-7589 or david.m.connolly8.civ@mail.mil if there are issues or concerns with this submission.

Sincerely,



Date: 2019.07.01
16:46:28 -04'00'

David M. Connolly
RVAAP Restoration Program Manager
Army National Guard Directorate

Attachments:

AOC photographs

Figures:

Figure 1 – Location of AOCs at RVAAP/Camp Ravenna

Figure 2 – “AS-Installed” Seibert Markers and Signs

cc: Tom Schneider, Ohio EPA, DERR (cover letter via email only)
Bob Princic, Ohio EPA, NEDO (cover letter via email only)
Mark Johnson, Ohio EPA, DERR (cover letter via email only)
Kevin Sedlak, ARNG, CJAG (cover letter via email only)
Katie Tait, OHARNG, CJAG (cover letter via email only)
Nathaniel Peters, USACE – Louisville (one [1] electronic copy)
Craig Coombs, USACE – Louisville (cover letter via email only)
Susan Oliver, Management Solutions, LLC (cover letter via email only)
Gail Harris, Vista Science Corp. (one [1] electronic copy, two [2] hard copies)

AOC Photographs



Asbestos Waste Disposal Site warning sign placed at RVAAP-51 Dump Along Paris-Windham Road.



"Unauthorized Personnel" sign placed at RVAAP-51 Dump Along Paris-Windham Road.



Seibert marker placed at RVAAP-51 Dump Along Paris-Windham Road.



Seibert markers and warning signs placed at RVAAP-51 Dump Along Paris-Windham Road.