Draft

Remedial Design for the RVAAP-12 Load Line 12

Ravenna Army Ammunition Plant Ravenna, Ohio

July 13, 2009

GSA Contract No. GS-10F-0076J Delivery Order No. W912QR-05-F-0033

Prepared for:



US Army Corps of Engineers.

United States Army Corps of Engineers Louisville District

Prepared by:



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14. ABSTRACT This remedial design presents a plan to address the dry sediment contamination in the Main Ditch at Load Line 12 at the Ravenna Army Ammunition Plant in Ravenna, Ohio. Removal of this dry sediment is in accordance with the Record of Decision for Soil and Dry Sediments at Load Line 12. Remediation of the Main Ditch completes the work necessary for soil and dry sediment to meet the standards for the anticipated future land use (National Guard Trainee).							
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CONTRACTOR STATEMENT OF INDEPENDENT TECHNICAL REVIEW

Science Applications International Corporation (SAIC) has completed the Draft Remedial Design for the RVAAP-12 Load Line 12 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 the 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 level of data obtained; and reasonableness of the results, including whether the product meets the customer's needs consistent with law and existing USACE policy.

Kutledge

Tia Rutledge Study/Design Team Leader

Jed Thomas, P.E. Independent Technical Review Team Leader

Significant concerns and the explanation of the resolution are as follows:

Internal SAIC Independent Technical Review comments are recorded on a Document Review Record per SAIC quality assurance procedure QAAP 3.1. This Document Review Record is maintained in the project file. Changes to the report addressing the comments have been verified by the Study/Design Team Leader.

As noted above, all concerns resulting from independent technical review of the project have been considered.

rmstrong

Scott Armstrong Principal w/ A-E firm

7/09/09 Date

<u>9 Jul 99</u> Date

7/1/09

Draft Remedial Design for the RVAAP-12 Load Line 12

Volume One - Main Report and Attachments Version 1.0

> Ravenna Army Ammunition Plant Ravenna, Ohio

GSA Contract No. GS-10F-0076J Delivery Order No. W912QR-05-F-0033

Prepared for: U.S. Army Corps of Engineers 600 Martin Luther King, Jr. Place Louisville, Kentucky 40202

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July 13, 2009

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OHARNG = Ohio Army National Guard

REIMS = Ravenna Environmental Information Management System

RVAAP = Ravenna Army Ammunition Plant

SAIC = Science Applications International Corporation

USACE = United States Army Corps of Engineers

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- Attachment B. Storm Water Pollution Prevention Plan
- Attachment C. Design Drawings:
 - C-1 Title Sheet
 - C-2 General Notes
 - C-3 Existing Site Conditions
 - C-4 Construction Site Plan
 - C-5 Dry Sediment Removal and Sampling Plan
 - C-6 Traffic Management Plan
 - C-7 Site Restoration Plan
 - C-8 Construction Details

Attachment D. Construction Forms and Checklists

Attachment E. Land Use Controls for Soil and Dry Sediment at the RVAAP-12 Load Line 12

ACRONYMS AND ABBREVIATIONS

AASHTO	American Association of State Highway and Transportation Officials
AOC	Area of Concern
APE	Area of Potential Effect
ARAR	Applicable and Relevant or Appropriate Requirements
BGS	Below Ground Surface
BMP	Best Management Practice
Camp Ravenna	Camp Ravenna Joint Military Training Center
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Constituent of Concern
COR	Contracting Officer's Representative
CQAP	Construction Quality Assurance Plan
DFFO	Director's Final Findings and Orders
DoD	U.S. Department of Defense
DOT	U.S. Department of Transportation
EPC	Exposure Point Concentration
FS	Feasibility Study
FSA	Field Staging Area
FWSHP	Facility-Wide Safety and Health Plan
GSA	U.S. General Services Administration
ICRMP	Integrated Cultural Resources Management Plan
IDW	Investigation-Derived Waste
INRMP	Integrated Natural Resources Management Plan
IRP	Installation Restoration Program
LL12	Load Line 12
LUC	Land Use Control
MEC	Munitions and Explosives of Concern
mg/kg	milligrams per kilogram
MI	Multi-Increment
mph	miles per hour
NCR	Non-Conformance Report
NELAC	National Environmental Laboratory Accreditation Conference
NFA	No Further Action
NGB	National Guard Bureau
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NW	Nationwide
OAC	Ohio Administrative Code
OHARNG	Ohio Army National Guard
Ohio EPA	Ohio Environmental Protection Agency
OHPO	Ohio Historic Preservation Office

ACRONYMS AND ABBREVIATIONS (CONTINUED)

ORAM	Ohio Rapid Assessment Method
OSHA	Occupational Safety and Health Administration
PAH	Polycyclic Aromatic Hydrocarbon
PBC	Performance Based Contract
PCB	Polychlorinated Biphenyl
PP	Proposed Plan
PPE	Personal Protective Equipment
QAPP	Quality Assurance Protection Plan
QA/QC	Quality Assurance/Quality Control
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RI	Remedial Investigation
ROD	Record of Decision
RRSE	Relative Risk Site Evaluation
RVAAP	Ravenna Army Ammunition Plant
SAIC	Science Applications International Corporation
SAP	Sampling and Analysis Plan
SSHO	Site Safety and Health Officer
SSHP	Site Safety and Health Plan
SVOC	Semi-Volatile Organic Compound
SWP3	Storm Water Pollution Prevention Plan
TCLP	Toxicity Characteristic Leaching Procedure
TSD	Treatment, Storage, or Disposal
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USACHPPM	U.S. Army Center for Health Promotion and Preventative Medicine
UXO	Unexploded Ordinance
VOC	Volatile Organic Compound

1 1.0 INTRODUCTION

2

Science Applications International Corporation (SAIC) has been contracted by the U.S. Army Corps
of Engineers (USACE), Louisville District, to provide environmental services in support of six (6)
high priority areas of concern (AOCs) at the Ravenna Army Ammunition Plant (RVAAP) in
Ravenna, Ohio. This Remedial Design (RD) describes the implementation process for the selected
remedy at Load Line 12 (LL12) as stated in the *Record of Decision for Soil and Dry Sediment at Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio* (USACE 2009).

9

10 This work is being performed under a Performance-Based Contract (PBC) in accordance with U.S. 11 General Services Administration (GSA) Environmental Advisory Services Contract GS-10-F-0076J. 12 In addition, planning and performance of all work elements is being conducted in accordance with the 13 requirements of the Ohio Environmental Protection Agency (Ohio EPA) Director's Final Findings

and Orders (DFFO) dated June 10, 2004 (Ohio EPA 2004).

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16 **1.1 PURPOSE**

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18 The purpose of this RD is to detail implementation of the selected remedial action alternative 19 specified in the Record of Decision for Soil and Dry Sediment at the Load Line 12 (RVAAP-12) at the 20 Ravenna Army Ammunition Plant, Ravenna, Ohio (USACE 2009). This Record of Decision (ROD) 21 specifies what is required to be addressed to remove chemical contamination in soil and dry sediment 22 at LL12 that exceed cleanup goals for the most reasonably anticipated land use (National Guard 23 Trainee and the Resident Subsistence Farmer). Dry sediment at LL12 in the Main Ditch was the only 24 area requiring remediation for soil and dry sediment at LL12 to achieve goals for the anticipated land 25 use. Therefore, the media addressed throughout this RD will be referred to as dry sediment.

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27 Specific elements of the remedial action described in this RD are as follows:

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- Excavate contaminated dry sediment at LL12;
- Transportation and disposal of contaminated dry sediment;
- Confirm risk-based cleanup goals for dry sediment have been attained;
- Restore excavated areas to neighboring or original contours and conditions; and
- Implement post-remedial action land use controls (LUCs).
- 35 **1.2 SCOPE**
- 36

The overall program goal of the Installation Restoration Program (IRP) is to clean up previously contaminated land at RVAAP to an acceptable level of risk as resources and mission requirements allow. LL12 is an AOC at RVAAP. This RD addresses chemical contamination in dry sediment at this AOC. Once the remedial action objectives and cleanup goals are met during the implementation of this RD, soil and dry sediment will be considered protective for the National Guard Trainee. This remedial design does not address other potentially-contaminated media. Dry sediment is considered unconsolidated inorganic and organic material on the surface of the ground that occasionally may be covered with water, usually following a precipitation event. Dry sediment does not function as permanent habitat for aquatic organisms although it may serve as a natural medium for the growth of terrestrial organisms. Dry sediment is essentially soil that due to its location may be covered with water occasionally. The selected remedy is consistent with the stated future action(s) to be performed at RVAAP.

7

8 The scope of this RD is to present a plan to excavate and dispose dry sediment containing 9 contaminant concentrations exceeding cleanup goals as specified in the ROD for LL12. The 10 estimated removal quantity presented in the ROD was 1,161 cubic yards. Since the development and 11 approval of the ROD, a high resolution land survey and sampling were performed in the Main Ditch. 12 This survey, sampling, and subsequent volume modeling resulted in an estimated volume requiring 13 removal of 706 cubic yards. Table 1-1 summarizes the most recent estimated quantities of dry 14 sediment that will be removed for LL12.

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Table 1-1. Estimated Removal Quantity for Dry Sediment

	Volume		Mass
Area of Concern	(ft3)	(yd3)	(tons)
Load Line 12	19,062	706	1,130

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18 Confirmation sampling will be conducted to ensure removal of all contaminated dry sediment 19 exceeding remedial cleanup goals. If a confirmation sample exceeds cleanup goals, additional dry 20 sediment will be excavated and the excavation area will be re-sampled. This process will continue 21 until cleanup goals are attained. Excavated areas will be restored in accordance with this RD.

22

Remedial activities will be implemented by USACE/SAIC and its subcontractors. SAIC (under contract with the USACE) is responsible for the excavation, characterization, and disposal of contaminated dry sediment. Implementation of these activities will meet the requirements of the Facility-Wide Sampling and Analysis Plan (SAP) (USACE 2001a), the Facility-Wide Safety and Health Plan (FWSHP) (USACE 2001b), and this RD.

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1.3 FACILITY DESCRIPTION

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When the RVAAP IRP began in 1989, RVAAP was identified as a 21,419-acre installation. The property boundary was resurveyed by Ohio Army National Guard (OHARNG) over a 2-year period (2002 and 2003) and the total acreage of the property was found to be 21,683.289 acres. As of February 2006, a total of 20,403 acres of the former 21,683-acre RVAAP has been transferred to the National Guard Bureau (NGB) and subsequently licensed to OHARNG for use as a military training site.

37

The current RVAAP consists of 1,280 acres scattered throughout the OHARNG Camp Ravenna Joint
Military Training Center (Camp Ravenna). Camp Ravenna is in northeastern Ohio within Portage
and Trumbull Counties, approximately 4.8 km (3 miles) east-northeast of the City of Ravenna and

approximately 1.6 km (1 mile) northwest of the City of Newton Falls. The RVAAP portions of the

2 property are solely located within Portage County. RVAAP/Camp Ravenna is a parcel of property

3 approximately 17.7 km (11 miles) long and 5.6 km (3.5 miles) wide bounded by State Route 5, the

4 Michael J. Kirwan Reservoir, and the CSX System Railroad on the south; Garret, McCormick, and

5 Berry roads on the west; the Norfolk Southern Railroad on the north; and State Route 534 on the east

- 6 (Figures 1-1 and 1-2). Camp Ravenna is surrounded by several communities: Windham on the north;
- 7 Garrettsville 9.6 km (6 miles) to the northwest; Newton Falls 1.6 km (1 mile) to the southeast;
- 8 Charlestown to the southwest; and Wayland 4.8 km (3 miles) to the south.
- 9

When RVAAP was operational, Camp Ravenna did not exist and the entire 21,683-acre parcel was a government-owned, contractor-operated industrial facility. The RVAAP IRP encompasses investigation and cleanup of past activities over the entire 21,683 acres of the former RVAAP. References to RVAAP in this document are considered to be inclusive of the historical extent of RVAAP, which is inclusive of the combined acreages of the current Camp Ravenna and RVAAP, unless otherwise specifically stated.

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1.4 LOAD LINE 12 DESCRIPTION AND HISTORY

19 LL12 covers about 80 acres in the southeastern portion of RVAAP. Elevations across LL12 range 20 from approximately 970 to 987 ft. Silty to clayey soil and glacial sediments overlie shale bedrock at 21 LL12, except where disturbed by RVAAP activities. The majority of LL12 was re-graded and soil 22 was disturbed during demolition activities that occurred between 1998 and 2000. Soil in the former 23 production areas contains a mix of sandy fill, sand, ballast material, slag, and residual debris (e.g., 24 metal, brick, and concrete). At LL12, the Main Ditch that bisects the central part of the AOC flows to 25 the north, into drainage ditches north of the AOC. The Main Ditch is heavily wooded. A stream 26 traverses LL12 from west to east and intercepts the Main Ditch near the northern boundary of the 27 AOC. Ultimately the drainage flows into the Cobbs Pond complex (Upper/Lower Cobbs Pond) 28 several hundred yards to the north of LL12. However, in recent years a beaver colony has 29 constructed dams north of LL12. These structures have prevented surface water drainage from the 30 AOC. As a result of these dams, stagnant water often resides within the Main Ditch and Active Area 31 Channel. Site features are presented in Figure 1-3 of the RD.

32

33 LL12 was originally known as the Ammonium Nitrate Plant and started operations on November 25, 34 1941. Structures related to the production of the ammonium nitrate were the Neutral Liquor Building 35 (Building FF-19) and seven evaporation/crystallization units (Buildings 900, 901, 902, 903, 904, 905, 36 and 906). Other structures, such as Water Works No. 2 and Power House No. 3 (Building FE-17), 37 housed support operations. The western half of the LL12 contained former production areas. The 38 eastern half was previously cleared, but did not contain any known production facilities. The 39 Remedial Investigations (RIs) also identified an area immediately north of the LL12 (informally 40 termed the Team Track Area) that was apparently used for offloading and staging of materials used in

41 LL12 production activities.

In May 1943, production of ammonium nitrate was terminated. From 1946 to 1950, a private contractor leased LL12 to produce fertilizer-grade ammonium nitrate. From 1965 to 1967, a private contractor leased Building FF-19 for the production of aluminum chloride. The U.S. Army terminated the lease early due to environmental concerns related to air emissions and wastewater discharges to Cobbs Ponds.

6

In June 1944, Buildings 900, 904, and 905 were converted for demilitarization of munitions. Rinsate from demilitarization operations was initially allowed to flow out of the buildings and directly onto the ground or to drainage ditches. In 1981, the LL12 Pink Water Treatment Plant was built to treat the demilitarization effluent prior to discharge. After the termination of demilitarization operations, the treatment plant was used under a National Pollutant Discharge Elimination System (NPDES) permit to treat explosives-tainted storm water from LL12 and other RVAAP locations.

13

Currently, there are no above-grade structures remaining at the LL12. Demolition of Buildings 901, 902, 906, and FF-19 took place between 1973 and 1975. Building FN-54 (bagging and shipping facility) was demolished in the 1980s. In 1999, approximately 1,500 ft³ of soil was removed from four pits near Building 904 and taken to a former warehouse at Load Line 4 as part of an explosives composting pilot study. Demolition of all remaining structures took place between 1998 and 2000. A former blast berm near Building 903 was removed and used as fill/groundcover for areas around Buildings 903 and FE-17.

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1.5 ANTICIPATED FUTURE LAND USE

The U.S. Army intends to transfer LL12 to the NGB once remedial actions are complete. The NGB will subsequently license the land to OHARNG for military training use. OHARNG has established the future land use (mounted training, no digging) for LL12 based on anticipated training mission and utilization of Camp Ravenna. This land use includes operation of wheeled and tracked vehicles.

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PREVIOUS ACTIVITIES

31 **1.6.1 Relative Risk Site Evaluation**

A relative risk site evaluation (RRSE) was performed by the U.S. Army Center for Health Promotion and Preventative Medicine (USACHPPM). The results of the RRSE (USACHPPM 1996) provided the U.S. Army with qualitative and quantitative data to score sites, which provided the U.S. Army with a basis for prioritizing cleanups and allocating funds. The scores can be "High," "Medium," or "Low." The evaluation gave LL12 a final score of "High." Re-evaluation of the LL12 risk ranking performed at the completion of the Phase I RI resulted in the AOC retaining its "High Risk" rating (USACE 1998).

1 **1.6.2** Phase I/Phase II Remedial Investigations

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The Phase I RI for LL12 (USACE 1998) included sampling and analysis of surface soil (0-1 ft below ground surface [BGS]), ditch sediment, and sediment from the Building 904 settling basin. The Phase I RI results indicated concentrations of explosives, inorganics, and organic compounds

6 occurring in soil and dry sediment throughout the production area above risk-based screening values.

7 The Phase II RI for LL12 (USACE 2006) characterized the nature and extent of contamination 8 surface soil (0 to 1 ft BGS), subsurface soil (1 to 7 ft BGS), sediment, surface water, and 9 groundwater, and assessed the potential risk to human health and the environment resulting from 10 former operations at LL12. Arsenic was identified as a constituent of concern (COC) in dry sediment 11 for the National Guard Trainee at LL12. Calculated risk from this metal is primarily associated with

12 the very high dust loading factor and inhalation rate assumed for the National Guard Trainee.

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Additional groundwater characterization was conducted in 2004 and was summarized in the *Phase II Remedial Investigation Supplemental Report for Load Line 12* (USACE 2005).

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17 **1.6.3 Feasibility Study**

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Preliminary cleanup goals for soil and dry sediment were developed in the LL12 Feasibility Study (FS) (USACE 2006) to support the remedial alternative selection process for dry sediment remediation at LL12. A summary of the preliminary cleanup goals for the COCs identified for evaluation is provided below in Table 1-2.

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24 25

Table 1-2. Feasibility Study Preliminary Cleanup Goal for Load Line 12 Soil and Dry Sediment
(National Guard Trainee)

		Clean-up
	Target Risk	Goal (mg/kg)
Arsenic	1E-05	31

^aSediment from the Main Ditch aggregate.

^bTotal carcinogenic risk to a National Guard Trainee from contaminants in the Main Ditch was calculated as 1.8E-05. The chemical hazard index was 0.23 (less than 1) indicating no unacceptable hazard.

29 COC – Chemical of concern.

30

Remedial alternatives were evaluated for contaminated dry sediment at LL12. The remedial alternatives were selected by combining general response actions, technology types, and process options retained from the screening processes described in the previous section. Remedial alternatives assured adequate protection of human health and the environment, achieved Remedial Action Objectives (RAOs), met Applicable and Relevant or Appropriate Requirements (ARARs), and permanently and significantly reduced the volume, toxicity, and/or mobility of COCs.

37

38 The recommended alternative for LL12, as presented in the FS, was Excavation of Dry Sediment with

39 Offsite Disposal ~ National Guard Trainee Land Use. This alternative removes dry sediment from the

40 Main Ditch at LL12 that exceeds preliminary cleanup goals for the anticipated future land use

41 (National Guard Trainee). Figure 1-3 presents features of LL12, along with the FS modeled extents

1 of contamination in the Main Ditch, where it was anticipated that the extents of the dry sediment in 2 the Main Ditch will be excavated to 1 ft BGS to achieve the remedial cleanup goals.

3 4

5

1.6.4 Community Involvement and Regulatory Approval

- 6 The *Proposed Plan for Soil and Dry Sediment at the Load Line 12 (RVAAP-12) at the Ravenna Army* 7 *Ammunition Plant* (USACE 2007) was presented to the public on April 4, 2007. A 30-day public 8 comment period was conducted until May 3, 2007. A public meeting was held presenting the 9 recommended alternative on April 10, 2007 in Newton Falls, Ohio. Comments were collected and 10 incorporated into a ROD.
- 11

The LL12 ROD (USACE 2009) documented the selected remedial action alternative to excavate and dispose of dry sediment from the Main Ditch until the remedial action cleanup goal (presented in Section 3 of this RD) was achieved. The ROD includes a Responsiveness Summary addressing public comments received during the public comment period and public meeting.

16 17

1.7 **REMEDIAL DESIGN ORGANIZATION**

18

19 This RD is comprised of a work plan, design drawings, and specifications. The work plan is 20 organized as follows:

21 22

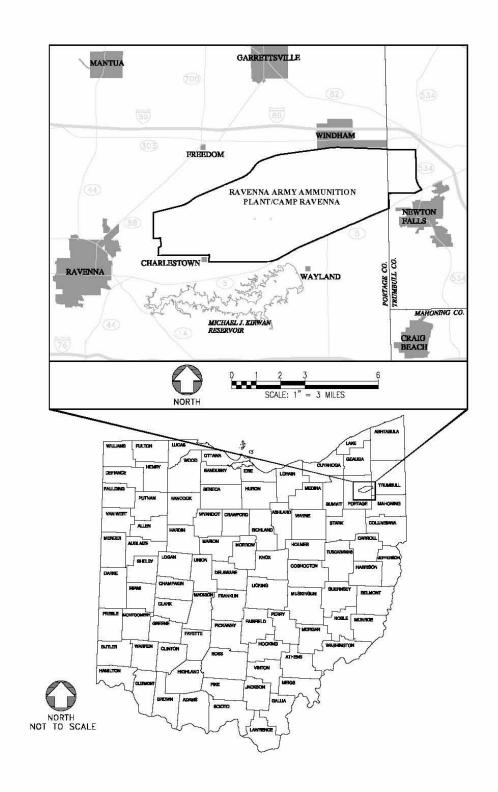
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36

37

38

- Section 2: presents the project organization and coordination;
- Section 3: outlines the remedial action objectives and cleanup goals;
- Section 4: describes the dry sediment characterization sampling;
- Section 5: discusses construction mobilization and site preparation;
- Section 6: describes dry sediment remedial activities;
- Section 7: presents the confirmation sampling procedure;
- Section 8: summarizes site restoration activities;
- Section 9: discusses waste characterization and disposal activities;
- Section 10: presents the Construction Quality Assurance Plan (CQAP);
- Section 11: discusses the post remedial action land use controls;
- Section 12: summarizes the reporting requirements and project schedule; and
- Section 13: lists the references used in the document.
- Attachments:
 - A. Site-Specific Health and Safety Plan (SSHP)
 - B. Storm Water Pollution Prevention Plan (SWP3)
 - C. Design Drawings
 - D. Construction Forms and Checklists
- 39E. Land Use Controls for Soil and Dry Sediment at the RVAAP-12 Load Line 12



1 2

Figure 1-1. General Location and Orientation of RVAAP/Camp Ravenna

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Figure 1-2. RVAAP/Camp Ravenna Installation Map

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2007

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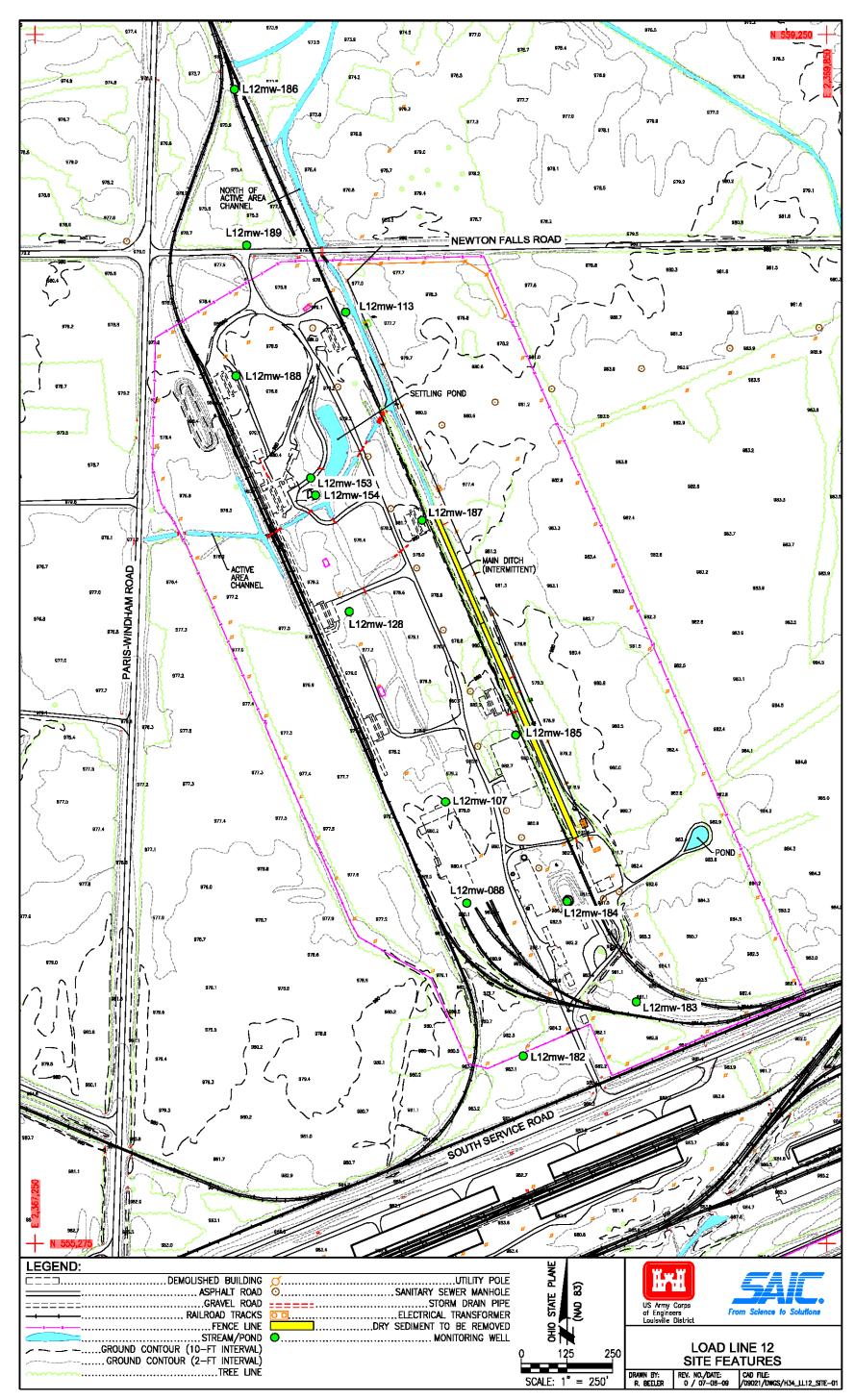


Figure 1-3. Features of Load Line 12

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2.0 PROJECT ORGANIZATION AND COORDINATION

This section presents the project organization and describes the project team coordination. This section also describes monthly reporting and participation in weekly contractor meetings at RVAAP by SAIC.

6

7

8

1 2

2.1 **PROJECT ORGANIZATION**

9 The U.S. Army is the lead agency for this remedial action and is responsible for its implementation. 10 The USACE - Louisville District has implementation and technical oversight responsibility on behalf 11 of the U.S. Army. Ohio EPA is the regulatory authority governing work on this remedial action. 12 SAIC is the primary contractor responsible for implementing this RD. SAIC will select and procure a 13 qualified remedial subcontractor to excavate, transport, and dispose of contaminated dry sediment. 14 An organizational chart for implementation of the RD is presented in Figure 2-1. Below is a 15 summary of key personnel responsibilities.

16 17

2.1.1 USACE Contracting Officer's Representative

18

19 The USACE Contracting Officer's Representative (COR) duties include overseeing SAIC to ensure 20 work is completed in accordance with the contract and this RD. The USACE COR also coordinates 21 responses for any unexpected materials encountered.

22

23 2.1.2 RVAAP Facility Manager

24

The RVAAP Facility Manager is responsible to sign waste profiles, manifests, and necessary permits.
The RVAAP Facility Manager will also assist in the coordination between SAIC and the RVAAP
Operations and Maintenance Contractor (Vista Sciences Corporation).

28 29

2.1.3 Ohio EPA Project Coordinator

30

The Ohio EPA Project Coordinator will oversee the implementation of this RD and will verify all
work completed by USACE or its agent (SAIC) meets regulatory requirements. The Ohio EPA
Project Coordinator will be informed of project schedule and implementation deviations.

34

35 2.1.4 SAIC Project Manager

36

The SAIC Project Manager administers the management, implementation, and quality of this RD and remedial action. The Project Manager provides oversight to ensure all contractual requirements are properly satisfied. This individual ensures all project goals and objectives are met in a high-quality and timely manner. The Project Manager is responsible for tracking project schedule and informing the USACE COR and Ohio EPA Project Coordinator of any deviations to the project schedule. The Project Manager provides the Ohio EPA Project Coordinator: 1) notification of project 1 implementation, and 2) information regarding any quality assurance and non-conformance issues for

- 2 this remedial action.
- 3

2.1.5 SAIC Technical Manager

4 5

6 The SAIC Technical Manager manages the technical performance and quality of the remedial action. 7 The Technical Manager oversees the SAIC Construction Manager in meeting project goals and 8 objectives in a high quality and timely manner and reports to the SAIC Project Manager. In 9 coordination with the SAIC Construction Manager and the SAIC Quality Assurance/Quality Control 10 (QA/QC) Officer, the SAIC Technical Manager addresses issues including identification of non-11 conformances and confirmation of achieving cleanup goals. Dependant upon the project complexity 12 and effort required, the SAIC Technical Manager and SAIC Construction Manager may be the same 13 person.

14

15 2.1.6 SAIC Quality Assurance/Quality Control Officer

16

17 The SAIC QA/QC Officer coordinates with the SAIC Construction Manager to ensure the 18 requirements of the RD CQAP and Facility-Wide Quality Assurance Protection Plan (QAPP) are 19 achieved and ensures inspections are performed in accordance with both plans.

20

21 The SAIC QA/QC Officer also provides quality control of sampling and sample handling (including 22 sample custody, field testing, and coordinating QA/QC of the laboratory), and ensures the required 23 submittals are on time and of high quality. The SAIC QA/QC Officer is responsible for reviewing 24 and approving variances during field activities before work continues; approving, evaluating, and 25 documenting the disposition of Non-Conformance Reports (NCR); and designing and supervising the 26 implementation of audit/surveillance plans. The SAIC QA/QC Officer reports directly to the SAIC 27 Project Manager and informs the SAIC Program Manager and SAIC Construction Manager of all 28 information and decisions reported.

- 29
- 30

2.1.7 SAIC Health and Safety Manager

31

The SAIC Health and Safety Manager establishes health and safety policies and procedures supporting project and office activities, and verifies safe work practices and conditions. The SAIC Health and Safety Manager ensures these policies are, at a minimum, in accordance with the Facility-Wide SHP (USACE 2001b). The SAIC Health and Safety Manager reports directly to the SAIC Project Manager and will inform the SAIC Technical Manager and SAIC Construction Manager of all information and decisions reported.

38

40

39 2.1.8 SAIC Construction Manager

41 The SAIC Construction Manager, also serving the role as appropriate to the Field Operations 42 Manager as defined in Section 3.4 of the Facility-Wide SAP (USACE 2001a), is responsible for 43 project control and implementation of remedial activities in accordance with this RD. The SAIC Construction Manager is responsible for subcontractor oversight, adherence to QA/QC field
 procedures and the SSHP, coordination with RVAAP personnel and the USACE COR, management
 of any investigation-derived wastes (IDW), field documentation, and preparation of field change
 orders, if required. Should separate construction and technical management positions be necessary,
 the SAIC Construction Manager will report directly to the SAIC Technical Manager.

6 7

2.1.9 Subcontractor Construction Manager

8

9 The Subcontractor Construction Manager implements specific contracted components of this RD. 10 The Subcontractor Construction Manager is responsible for the proper performance of specified 11 remedial activities in accordance with this RD, adherence to QA/QC field procedures and the CQAP, 12 implementation of the SSHP, coordination of field personnel activities, and field documentation. The 13 Subcontractor Construction Manager reports directly to the SAIC Construction Manager.

14 15

2.1.10 Subcontractor Site Safety and Health Officer

16

17 The Subcontractor Site Safety and Health Officer (SSHO) is responsible for implementation and 18 adherence of the SSHP. SSHO will verify and approve specified health and safety procedures 19 outlined in the SSHP adequately protect on-site personnel during field activities. SSHO will ensure 20 that health and safety procedure are modified to meet changing needs, if required. The SSHO will 21 ensure all on-site personnel (including visitors) strictly adhere to the SSHP throughout the field 22 activities conducted for the duration of the project. The SSHO reports to the Subcontractor 23 Construction Manager and the SAIC Construction Manager.

24

25 2.1.11 MEC Avoidance Subcontractor

26

27 Load Line 12 was designated as a No Further Action (NFA) AOC in the Site Inspection Report for 28 Munitions Response Sites under the Military Munitions Response Program (E2M 2008). However, a 29 Munitions and Explosives of Concern (MEC) Avoidance Subcontractor will be onsite during remedial activities in the event MEC is encountered. The MEC Avoidance Subcontractor will be 30 31 responsible to ensure that MEC is either avoided or determine the appropriate measures for removal. 32 The USACE, Huntsville Support Center will review this RD to determine the qualifications and 33 number of unexploded ordnance (UXO)-qualified person(s) required on site to serve as the MEC 34 Avoidance Subcontractor. One certified UXO Technician II will be used; however, a safety backup 35 person must be available. The backup person does not have to be UXO-qualified.

36

37 2.2 MONTHLY REPORTS

- 38
- A summary of field activities for this remedial action will be included in monthly reports issued per the *Project Management Plan for the Six High Priority Areas of Concern* (SAIC 2005). The monthly
- 41 reports will include a status and summary of project activities.

1 2.3 WEEKLY CONTRACTOR MEETING

2

SAIC will participate in the RVAAP weekly coordination meetings from one week prior to and for
the duration of removal activities. The Subcontractor may participate in these meetings on an asneeded basis. These weekly coordination meetings are typically held on Mondays in RVAAP
Building 1037.

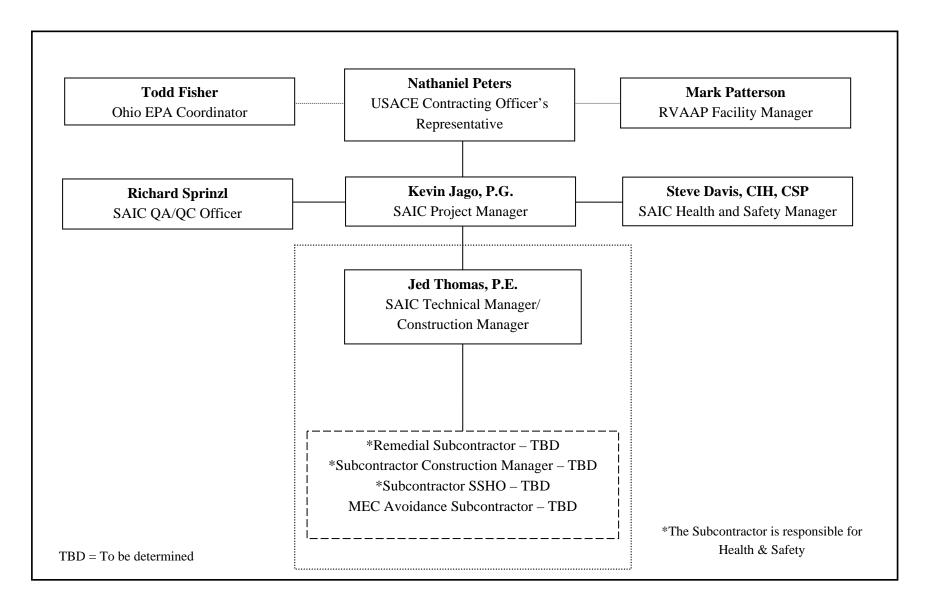
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2.4 **BI-WEEKLY SCHEDULE CALLS**

8 9

10 SAIC will participate in bi-weekly teleconferences with the Ohio EPA and the U.S. Army, per the

Project Management Plan for the Six High Priority Areas of Concern (SAIC 2005). SAIC will
 communicate the progress of remedial actions at this meeting.





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3.0 REMEDIAL ACTION OBJECTIVES AND CLEANUP GOALS

2

This section describes the RAOs and cleanup goals for the selected remedy. RAOs specify the requirements the remedial action must fulfill to protect human health and the environment under current and reasonably anticipated future land use scenarios. The cleanup goals are the contaminant concentrations required to achieve the RAOs.

3.1 **REMEDIAL ACTION OBJECTIVE**

8 9

7

The RAO for LL12 is to prevent the National Guard Trainee from being exposed to contaminants in dry sediment that exceed the cleanup goals. The selected remedy will address dry sediment in the Main Ditch to a depth of 4 ft BGS given the potential disruption to soil and dry sediment to that depth under National Guard Trainee future land use. There are no soil COCs requiring remedial action to achieve the National Guard Trainee land use requirements.

15

16 **3.2 REMEDIAL ACTION CLEANUP GOAL**

17

The arsenic exposure point concentration (EPC) for dry sediment in the Main Ditch at LL12 is 410 mg/kg, which exceeds both the RVAAP Facility-Wide background value (20 mg/kg) and the cleanup goal for the National Guard Trainee (31 mg/kg). Based on the risk evaluation, dry sediment in the Main Ditch requires remediation. Table 3-1 presents the cleanup goal for LL12. Land use controls with respect to chemical contamination in soil and dry sediment will be required because the remedial action cleanup goal for the Resident Subsistence Farmer will not be achieved (Attachment E).

- 24
- 25

Table 3-1. COC and National Guard Trainee Cleanup Goal for Dry Sediment at LL12

COC ^{a, b}	Clean-up Goal (mg/kg)	
Arsenic	31	

^aDry sediment from the Main Ditch aggregate.

^bTotal carcinogenic risk to a National Guard Trainee from contaminants in the Main Ditch was calculated as 1E-05.

28 COC = Constituent of concern.

29 EPC = Exposure Point Concentration

30 mg/kg = milligrams per kilograms

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l	4.0 DRY SEDIMENT CHARACTERIZATION SAMPLING
2 3	On May 4, 2009, SAIC conducted dry sediment characterization sampling within the Main Ditch at
ļ	LL12. The objectives of this characterization sampling included the following:
	1.) Determine if dry sediment will be considered nonhazardous or hazardous waste; and
	2.) Assist in estimating quantities of dry sediment requiring disposal to achieve cleanup goals as
	established in the ROD.
	To accomplish these objectives, the Main Ditch (as modeled in the LL12 FS) was divided into four
	approximately equal segments [Multi-Increment (MI) Sample Areas]. These four MI Sample Areas
	are presented in Figure 4-1. The following sections describe the sampling methods, sampling results,
	and conclusions from this characterization sampling.
	4.1 CHARACTERIZATION SAMPLE COLLECTION
	SAIC field personnel collected characterization samples from four MI Sample Areas (L12-256M,
	L12-257M, L12-258M, and L12-259M) within the Main Ditch. One MI and one discrete sample

19 20

> Procedures for sampling were presented in the *Technical Memorandum to Conduct Remedial Design Soil Sampling at RVAAP-01 Ramsdell Quarry Landfill, RVAAP-12 Load Line 12, and RVAAP-16 Fuze and Booster Quarry Landfill/Ponds* (issued to USACE, Ohio EPA, and OHARNG on April 1, 2009). The trowel/spoon method was used to collect dry sediment samples. The sampling was accomplished using disposable, sterilized plastic scoops. This instrument was used to manually dig into the subsurface material to the required depth designated for the sampling location (0 to 0.5 ft

27 28

29

4.1.1 Multi-Increment Sampling for Characterization

BGS for a sediment aggregate).

were collected from each MI sample area for offsite laboratory analysis.

30

An MI sample, a combined sample of multiple aliquots collected from random points, was collected from four MI Sample Areas (L12-256M, L12-257M, L12-258M, and L12-259M). Each MI Sample was analyzed for toxicity characteristic leaching procedure (TCLP) metals, TCLP semi-volatile organic compounds (SVOCs), TCLP Pesticides, TCLP Herbicides, Reactive Cyanide, Reactive Sulfide, and polychlorinated biphenyls (PCBs). In addition, each sample was analyzed for total arsenic, which was identified as the COC in dry sediment for the National Guard Trainee at LL12.

37

Each MI sample consisted of no less than 30 aliquot samples, which will provide a 95% statistical confidence level. Each aliquot sample was collected with a disposable, sterilized plastic scoop, and were of approximately equal volume. The aliquot samples were collected randomly from the surface of the MI Sample area.

All aliquot samples collected from each MI sample area were placed in a container for transport to a 1

2 NELAC (National Environmental Laboratory Accreditation Conference) approved off-site laboratory. 3 As part of the MI sample process, each MI sample was dried, sieved, finely ground by the off-site

4 laboratory, and then analyzed for the specified constituent.

5 6

7

4.1.2 **Discrete Sampling for Characterization**

- 8 One discrete sample was collected from the middle of each MI Sample Area. The dry sediment was 9 directly packed into a sample jar and sealed. These samples were analyzed for the TCLP Volatile 10 The discrete sample was collected in a manner to minimize Organic Compounds (VOCs). 11 volatilization during the sample collection process. This sample did not undergo the drying, sieving, 12 and grounding prior to analysis.
- 13

14

4.1.3 **Characterization Sample Identification** 15

16 Specific sample identifying information that was used during the sampling effort is presented in Table 17 4-1.

- 18
- 19

Table 4-1. Sample Identification for Waste Characterization Sampling

		Arsenic,	TCLP ^a	TCLP (SVOCs, Metals, Pest,	Reactive Cyanide, Sulfide, and
Location	Sample ID	Total	(VOCs)	Herb)	PCBs
L12-256M	L12sd-256M-0905-SD	1	0	1	1
L12-256M	L12sd-256-0906-SD	0	1	0	0
L12-257M	L12sd-257M-0907-SD	1	0	1	1
L12-257M	L12sd-257M-0907-FD	1	0	0	0
L12-257M	L12sd-257-0908-SD	0	1	0	0
L12-258M	L12sd-258M-0909-SD	1	0	1	1
L12-258M	L12sd-258-0910-SD	0	1	0	0
L12-259M	L12sd-259M-0911-SD	1	0	1	1
L12-259M	L12sd-259-0912-SD	0	1	0	0

20 Additional parameters (e.g., paint filter test) may be required by the waste disposal facility. The waste disposal

21 facility has not been selected at the time of this design.

22 A field duplicate (FD) for L12-257M was collected and analyzed arsenic.

23 ^a Samples analyzed for VOCs will be collected as a discrete sample and will not undergo laboratory MI

24 Processing (particle size reduction).

25 L12 = Load Line 12

26 Herb = Herbicides

27 MI = Multi-increment

28 PCB = polychlorinated biphenyl

- 29 Pest = Pesticides
- 30 SVOC = semivolatile organic compound
- 31 TCLP = toxicity characteristic leaching procedure
- 32 VOC = volatile organic compound

1 4.2 CHARACTERIZATION SAMPLING RESULTS AND CONCLUSIONS

2 3

A sample from each MI area was collected for the waste characterization analysis. The data for this waste characterization analysis will not be provided in this RD, as this data is pertinent to the landfill

- 5 for classification purposes. A summary of the waste characterization data is below.
- 6 7

4

- 1.) All TCLP metals, VOCs, SVOCs, herbicides, cyanide, and sulfides were either nondetectable, or below the reporting limits.
- 9 10

8

nondetectable, or below the reporting limits.
2.) PCB concentrations were nondetectable with the exception of Aroclor 1254. The detected concentrations for Aroclor-1254 had a range of 0.042 - 0.270 mg/kg, which is below the

- TSCA level of 25-50 mg/kg that would require re-classification of the waste.
- 11 12 13

3.) The pH of the dry sediment was between 5.2-6.8.

Based on these data, the excavated dry sediment within the Main Ditch at LL12 would be classified as nonhazardous waste. The final classification of the dry sediment for disposal will be verified by the licensed disposal facility and documented on the appropriate waste profile during the remedial action procurement process.

18

Additionally, a MI sample from each of the four MI Sample Areas was analyzed for arsenic, as
arsenic is the COC for remediation specified in the ROD. Table 4-2 presents the results of these
samples.

- 22
- 23

 Table 4-2. Sample Results and Cleanup Goal Comparison

		Arsenic Concentration	Concentration Exceed Arsenic
Location	Sample ID	(mg/kg)	CUG of 31.0 mg/kg?
L12-256M	L12sd-256M-0905-SD	101	Yes
L12-257M	L12sd-257M-0907-SD	43.6	Yes
L12-257M	L12sd-257M-0907-FD	36.0	Yes
L12-258M	L12sd-258M-0909-SD	35.0	Yes
L12-259M	L12sd-259M-0911-SD	21.1	No

A field duplicate (FD) for L12-257M was collected and analyzed arsenic.

- 25 CUG = Cleanup Goal.
- L12 = Load Line 12.
- 27

28 Below is a summary of these sampling results.

29

The three southern MI areas within the Main Ditch (L12-256M, L12-257M, and L12-258M)
 had concentrations exceeding the cleanup goal for arsenic in sediment. Arsenic
 concentrations were progressively lower from the furthest upstream sample area (L12-256M),
 adjacent to former Building FF-19, to sample area (L12-258M).

34 2.) The northernmost MI area (L12-259M) had an arsenic result below the cleanup goal. This is
35 also the furthest downstream location of the Main Ditch.

- 1 Based on this data, this RD will incorporate the removal and disposal of sediment in the three MI
- 2 areas exceeding the cleanup goal for arsenic (L12-256M, L12-257M, and L12-258M). The MI area
- 3 below the cleanup goal for arsenic (L12-259M) will not require further investigation or remediation
- 4 for dry sediment.

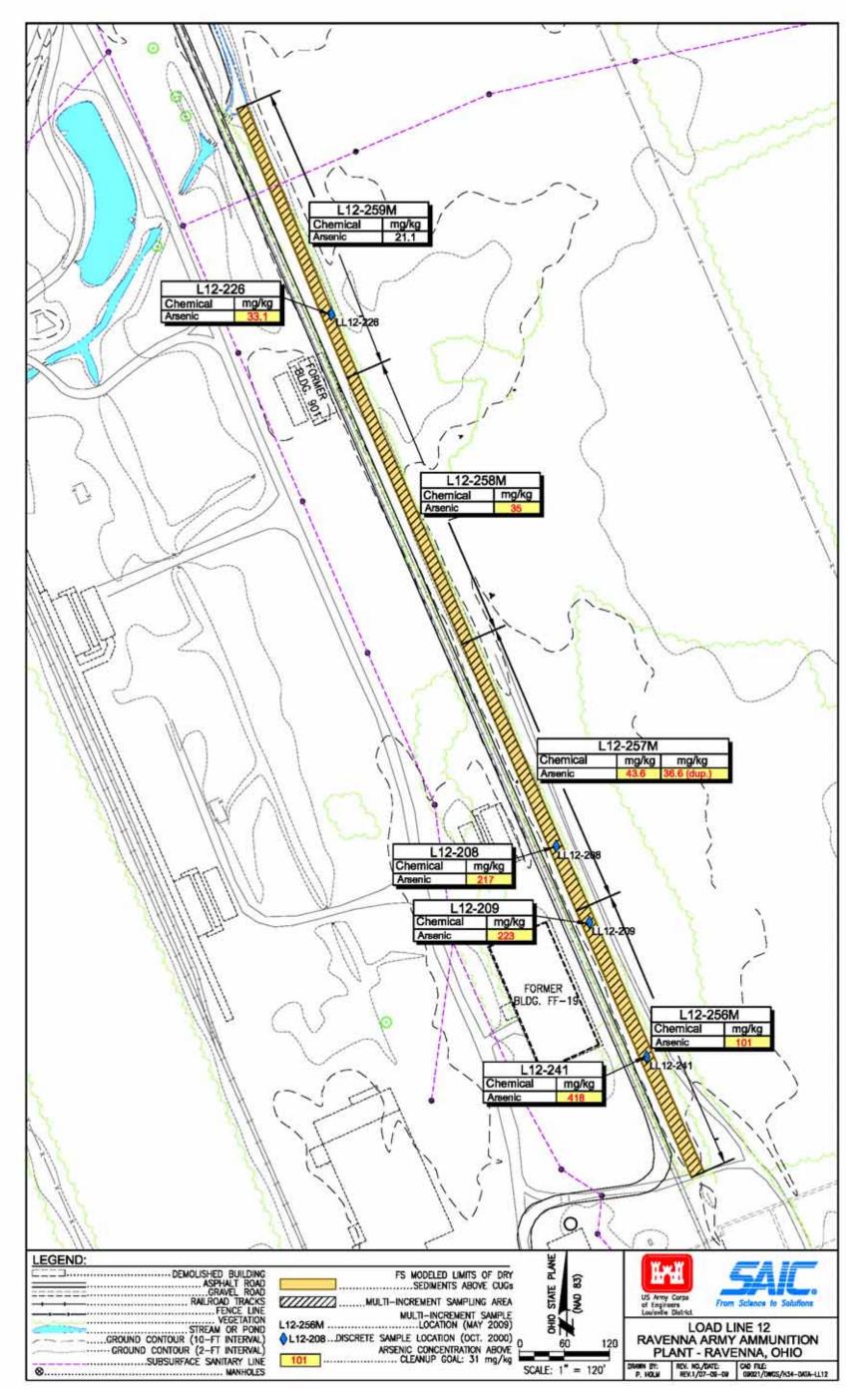


Figure 4-1. Load Line 12 Characterization Sample Locations and Results

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1 5.0 CONSTRUCTION MOBILIZATION

This section describes construction mobilization and site preparation activities required to implement this RD. Design drawings (Attachment C) detailing remedial action requirements are referenced as appropriate throughout this section.

6

2

The Subcontractor will prepare an addendum to the SSHP (Attachment A) in accordance with
USACE and Occupational Safety and Health Administration (OSHA) guidelines. SAIC will review
and approve the SSHP Addendum prior to the start of remedial activities. The final SSHP Addendum
will be distributed to the U.S. Army, Ohio EPA, OHARNG, and the RVAAP Administrative Record.

11

12 13

5.1 PERMIT AND NOTIFICATION REQUIREMENTS

Based on review of applicable requirements, the following permits and notifications are required forremedial action:

16 17

18

19

20

- Notification and approval of remedial action by the U.S. Fish and Wildlife Service;
- Submittal of the State of Ohio Historic Preservation Office Project Summary Form;
- Ohio EPA NPDES Construction General Permit No. OHC000003;
 - Notifications to the Ohio EPA; and
 - Wetland Permit Requirements.
- 21 22

SAIC and the Subcontractor are responsible for meeting all permitting requirements per the State of
 Ohio and the federal government. SAIC and the Subcontractor will prepare all signatory
 documentation (e.g., permits and notifications) and submit to RVAAP or USACE representatives for
 review. Waste profiles and manifests will be signed by the RVAAP Facility Manager.

27

28 5.1.1 Endangered Species Protection

29

Section (h) *Endangered Species Protection* of 40 *CFR* 6.302 prohibits federal agencies from jeopardizing threatened or endangered species or adversely modifying habitats essential to their survival. The U.S. Fish and Wildlife Service office in Reynoldsburg, Ohio will be informed of the remedial activities prior to mobilization. The notification will state the implementation of this RD will have no impact on federally-endangered or threatened species. The U.S. Fish and Wildlife Service must approve the remedial activities prior to any implementation.

36

A site-wide Indiana bat survey was conducted at Camp Ravenna in January 2005 and was documented in the *Training Site-Wide Survey for the Indiana Bat (Myotis sodalis) at the Ravenna Training and Logistics Site, Portage and Trumbull Counties, Ohio, Final Report* (ESI 2005). The

40 survey identified six species of bats at Camp Ravenna but did not identify any Indiana bats.

The OHARNG has also completed extensive flora and fauna surveys which have included surveying
 the Mitchell satyr butterfly (federally endangered), northern monkshood (federally threatened), and

- 3 eastern massasauga (federal candidate). No federally listed species have identified at Camp Ravenna.
- 4

5.1.2 Protection of Historic Properties

5 6

LL12 is located within an area identified on the disturbance map in the OHARNG Integrated Cultural Resources Management Plan (ICRMP) as being highly disturbed by past construction activity. The disturbance in such areas is considered so great that any historic properties, if present, would have been destroyed or disturbed to the degree that they have lost historic integrity and have no value as historic properties. The Area of Potential Effect (APE) for the remediation activities consists of the previously-constructed drainage ditch and the immediate vicinity, and is within the previously disturbed area.

14

Based on the past disturbance history of the APE, it is has been determined that there is no potential for the remedial action to impact historic properties. A letter outlining the remedial action and the determination of no affect on historic properties will be sent to the Ohio Historic Preservation Office (OHPO) for their review and concurrence. Implementation of the remedial action will not take place until the OHPO has reviewed and concurred with the determination.

20

With any ground disturbing activity there is always the potential of an inadvertent discovery of human remains or funerary objects. If such items are encountered during the remedial action, excavation will immediately stop and the OHARNG Cultural Resources Manager, USACE COR, SAIC Project Manager, and RVAAP Facility Manager will be notified. Standard Operation Procedure #6 in the OHARNG ICRMP will be implemented. Excavation will not resume until the site has been released by the OHARNG Cultural Resources Manager.

27 28

5.1.3 Ohio EPA Requirements

29

The total area of construction associated with LL12 remedial activities is estimated to be approximately 2.3 acres. Consequently, SAIC will develop a site-specific SWP3. Once reviewed by USACE, SAIC will submit a Notice of Intent (NOI) prior to the start of construction activities under the Ohio EPA NPDES Construction General Permit No. OHC000003. Required permitting will be completed by SAIC, reviewed by USACE, and signed by SAIC and/or the Subcontractor prior to the start of mobilization activities.

- 36
- 37
 - USACE/SAIC will notify Ohio EPA of the following:
- 38 39
 - Initiation of construction activities (minimum 7 days prior);
- Selected disposal facility (minimum 5 days prior to shipping material off-site);
- Disposal options for collected storm water (if any) upon receipt of sample results; and
- Initiation of confirmation samples (minimum 2 days prior).

1 5.1.4 Wetland Permit Requirements

2

A wetlands and other waters delineation was conducted by EnviroScience, Inc. in November 2008.
Results of the this delineation are documented in *The Wetlands and Other Waters Delineation Report for the Remedial Action at Ramsdell Quarry Landfill, Load Line 12 and Fuze and Booster Quarry Landfill/Ponds* (EnviroScience 2008). The Main Ditch at LL12 was categorized as a stream with

relatively permanent water (due to upstream beaver dam), as well as, a Category 1 (ORAM)
palustrine emergent wetland. This report was submitted to the USACE - Pittsburgh District for
Jurisdictional Determination.

10

USACE-Pittsburgh District determined the wetland within the Main Ditch is jurisdictional waters. Therefore the wetland falls under Federal Regulations. Per Federal Regulations and Nation Wide Permit (NWP) 38, wetlands impacted by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities are exempt from permit requirements. Delineated wetlands within LL12 are depicted on Attachment C, Drawing C-3.

16

17 **5.2**

18

19 This section describes the site preparation activities that must be performed by the Subcontractor 20 prior to beginning construction activities at the site. Site preparation activities consist of several 21 elements designed to maximize access to the site and prevent migration of soil and dry sediment 22 during construction, including:

23 24

• Utility survey and clearance;

SITE PREPARATION

- Establishing site controls and site access;
- Setting up construction support facilities;
- Vegetation clearing;
- Constructing dewatering and diversion berms; and
 - Installing erosion and sediment controls.
- 29 30

5.2.1 Utility Clearance

31 32

The Subcontractor will notify SAIC and the RVAAP Facility Manager a minimum of 28 calendar days prior to initiating remedial activities to allow sufficient time for a utility clearance to be conducted by appropriate RVAAP personnel. Any identified utilities (underground and aboveground) will be maintained as determined by RVAAP Facility Manager.

37

In the event an unmarked utility is discovered during remedial activities, all work will stop immediately and the RVAAP Facility Manager, USACE COR, and SAIC Project Manager will be notified immediately. RVAAP personnel will determine the disposition of the discovered utility. RVAAP personnel and SAIC will collaborate on any necessary actions in order to continue remedial activities. If the discovery of an unmarked utility results in a change to the scope, objectives, or schedule of this RD, SAIC will notify the USACE COR and Ohio EPA Project Coordinator for
 concurrence on proposed revisions and/or corrective actions.

3 4

5.2.2 MEC Clearance

5

6 LL12 was identified as No Further Action in the Site Inspection Report for Munitions Response Sites
7 under the Military Munitions Response Program (E2M 2008). However, to ensure MEC will not
8 pose a safety or health threat, a certified UXO Tech II MEC Avoidance Subcontractor will be on-site
9 during mobilization and remedial activities.

10

Prior to remedial activities, the MEC Avoidance Subcontractor will be responsible for a MEC survey 11 12 of areas at LL12 that will be remediated and used to stage equipment to perform the remedial action. 13 The MEC Avoidance Subcontractor will identify items suspected of being MEC and will contact the 14 Subcontractor SSHO and SAIC Construction Manager upon discovery of MEC. The SAIC 15 Construction Manager will contact the SAIC Project Manager, the USACE COR, and the RVAAP 16 Facility Manager. In the event that MEC is identified in the area, activities will cease until the 17 Subcontractor takes active measures for removing the MEC and completes all activities as prescribed 18 in USACE Engineer Pamphlet (EP) 75-1-2.

19

20 5.2.3 Site Control and Access

21

The RVAAP Facility Manager will grant site access and the Subcontractor will control the site during
 remedial activities. The project sites will be controlled at ingress and egress points. Site controls will
 include:

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27

28 29

- Controlling access to the project sites by signage, requiring visitors to sign-in, and putting caution tape around the excavation areas;
- Erecting signs at locations indicated on Attachment C, Drawing C-6 to expedite deliveries, maintain traffic flow, promote safety, and prevent interference with other RVAAP/Camp Ravenna operations; and
- 31 32

30

• Adhering to RVAAP traffic rules.

33 34

The Subcontractor will comply with all Ohio and RVAAP traffic rules. The Subcontractor will not exceed the posted speed limit of 35 miles per hour (mph) during daylight hours and 25 mph at night while on RVAAP main roads. A speed limit of 10 mph on the project access road will be maintained. At no time will the RVAAP main roads be blocked by the Subcontractor during remediation activities. Traffic flow must be maintained on at least half of the roadway width at all times. Approval, prior to starting any activity that will obstruct traffic flow, will be obtained from Camp Ravenna, the RVAAP Facility Manager, and SAIC Construction Manager. 1 The use of two-way radios and cell phones is permitted at the RVAAP. The SAIC Construction

2 Manager will coordinate with RVAAP security to ensure that contact with Post 1 is maintained at all

3 times.

4

5 5.2.3.1 Facility Access Protocol

6

All personnel and vehicles must enter RVAAP through the main entrance (8451 State Route 5, Ravenna, OH 44266) and are subject to search and inspection. Weapons, lighters (or similar fire starters), and alcoholic beverages are prohibited within RVAAP; prohibited items may be left with security while onsite. Security personnel will confiscate prohibited items discovered during inspections.

12

SAIC will submit a roster of all personnel and subcontractors who will be working at RVAAP to the RVAAP Operations and Maintenance Contractor in advance of field work. This roster will be maintained and submitted to the RVAAP Operations and Maintenance Contractor. All personnel approved to enter RVAAP must provide a government issued identification (e.g., driver's license, passport) at the entrance. Upon entry and exit to RVAAP, each person is required to sign a roster annotating the time of day and the area they are working at or visiting.

19

20 5.2.3.2 Site Access Protocol

21

All supervisors, workers, and site visitors entering the construction area must provide training records specified in Table 5-1 of the SSHP (Attachment A) prior to entry of the construction area and/or exclusion zones. Site visitors arriving throughout the day must: 1) undergo a briefing by the SAIC Construction Manager and Subcontractor SSHO; and 2) provide necessary training records and documentation prior to approaching or entering the exclusion zone. All site visitors must be approved by the SAIC Construction Manager and Subcontractor SSHO to enter the construction area and/or exclusion zones.

29

30 5.2.4 Construction Support Facilities

31 32 Construction support facilities for this RD may include: 33 34 • Sanitary facility; 35 Equipment staging area; Access road improvements, and 36 • 37 Truck haul route/loading area improvements. • 38

39 Locations for these facilities are presented on Attachment C, Drawing C-4.

1 **5.2.4.1** Access to Load Line 12

2

LL12 will be accessed from a mixture of improved and unimproved roads located off of South Service Road (Attachment C, Drawing C-6). The Subcontractor will maintain the access road to allow haul trucks and heavy equipment to traverse safely and efficiently. If visible dust is being generated by equipment, then dust suppression measures (e.g., wetting) will be employed. Additional stone may be required to improve the existing access road to LL12.

8

9 The Subcontractor will use the former railroad bed, consisting of compacted ballast (crushed stone), 10 adjacent to the Main Ditch at LL12 as the haul truck route/loading area (Attachment C, Drawing C-11 4). The Subcontractor will be responsible to remove any debris (e.g., track spikes) within the ballast 12 to prevent damage to construction vehicle tires. Additional stone will be placed and graded as 13 required to improve the railroad bed for truck loading and traffic. If areas where the existing access 14 road and railroad bed are significantly uneven, the Subcontractor will level the ground, apply one 15 layer of geotextile fabric and two 6-inch courses of crushed stone (AASHTO No. 2). The 16 Subcontractor will be responsible to maintain the access road and haul truck route throughout the 17 project (e.g., ensure it is free of mud). Any improvements made to the access road and haul truck 18 route shall remain in place at the completion of restoration activities at LL12.

19

20 Should the Subcontractor require additional space for stockpiling "clean" material (e.g., rip rap, 21 backfill) beyond the designated equipment staging area, the Subcontractor may temporarily pile 22 materials within the clearing and grubbing area (west side of ditch only) provided the material is used 23 within 24-hours of being place and covered over night. If long term stockpile storage is needed, the 24 Subcontractor may install a fabric/rock pad south of the designated staging area. The pad will consist 25 of one layer of geotextile fabric and two 6-in courses of crushed stone. The Subcontractor shall cover 26 the material for the duration of storage and remove the fabric/rock pad at the completion of the 27 restoration activities.

28

29 5.2.5 Fueling Areas

30

Fueling activities will be required to take place at the Equipment Staging Area (Attachment C, Drawing C-4). All necessary control measures and spill equipment will be established and maintained, as specified in Section 10.4.1.

34

35 5.2.6 Vegetation Clearing

36

37 Clearing and grubbing will be required to facilitate equipment access, and dry sediment removal 38 (Attachment C, Drawing C-4). Clearing and grubbing will primarily involve felling and removing 39 trees located on and around the excavation areas and haul truck routes. Trees greater than four inches 40 in diameter will be cut and stacked neatly at LL12 away from remedial activities. Trees less than four 41 inches in diameter shall be cut into manageable pieces and chipped. Wood chips not used for 42 absorbent material will be spread over the AOC by the Subcontractor. Tree stumps and associated 1 roots within the limits of excavation shall be removed and disposed of with the contaminated dry 2 sediment.

3

5.2.7 Vehicle Access Routes

4 5

6 LL12 may be accessed from two improved roads, South Service Road (south side) and Newton Falls
7 Road (north side) (Attachment C, Drawing C-6). The Subcontractor will maintain and repair the
8 access roads to allow equipment to traverse safely and efficiently. Dust suppression measures (e.g.,
9 wetting) will be employed if visible dust is generated by equipment. Additional crushed stone may be
10 required to further improve the access road.

- 11
- 12 13

14

15

5.3 STORM WATER POLLUTION PREVENTION

5.3.1 Storm Water Control Best Management Practices

The Subcontractor will install storm water controls prior to initiating remedial activities in accordance with this section of the RD, SWP3 (Attachment B) and as detailed on Attachment C, Drawing C-4. Best management practices (BMPs) will be employed to protect the excavation area from storm water run-on and run-off. Erosion and sedimentation controls will include both non-structural BMPs and structural BMPs. Non-structural BMPs to be employed at the project site include:

21 22

23

- Minimizing disturbance;
- Phasing of construction operations; and
- Maintaining good housekeeping practices.
- 24 25

26 Structural BMPs to be employed at the site include:

27 28

29

- Improved roadways/haul routes;
- Dewatering/diversion berms; and
- Silt fencing.
- 30 31

To further minimize the potential for erosion and sediment run-off, no work will be performed during periods of inclement weather, as determined by the SAIC Construction Manager. The excavation areas will be opened and covered as quickly as possible during construction activities.

35

36 5.3.1.1 Main Ditch Water Diversion

37

The Main Ditch at LL12 discharges into the Active Area Channel which flows generally north and ultimately discharges into Upper and Lower Cobbs Ponds (approximately 650 yards north of LL12). Prior to excavation activities, the Subcontractor will install a plug in the discharging pipe at the furthest upstream location of the Main Ditch. This plug will be inspected daily. Additionally, the Subcontractor shall install dewatering berms (sandbags, temporary cofferdam, or an equivalent watertight barrier) immediately north and south of the excavation area, as shown in Attachment C, Drawing C-4, and remove all standing water from the excavation area. The water will be filtered through a sediment bag and discharged into the Active Area Channel. During excavation activities, any water accumulation in contact with an open excavation will be considered contact water, and will be pumped and managed in accordance with Section 5.3.2. If the excavation extent encroaches on the dewatering berm, the berm will be relocated accordingly.

6 7

5.3.1.2 Silt Fencing

8

9 The Subcontractor will install silt fencing as specified in Attachment C, Drawing C-4. In general, silt
10 fencing will be installed between active construction areas and existing wetlands on level contours.
11 The silt fence will undergo inspections in accordance with Section 10.4.2.

12

5.3.2 Excavation Water Management

13 14

Excavation water is considered any water that accumulates in an excavation and comes into contact with unearthed dry sediment containing contaminants above the remedial cleanup goal during construction activities. The Subcontractor will be responsible for pumping excavation water to a temporary water storage tank to be located in the equipment staging area. The temporary water storage tank will be staged and stored as to avoid streams and water bodies. The Subcontractor will also be responsible for sampling and disposing the excavation water in accordance with Section 9.2.6 of this RD.

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5.3.3 Non-Contact Storm Water Management

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Storm water that accumulates at the construction site during excavation activities that does not contact unearthed contaminated dry sediment may be discharged over the ground surface so it does not create construction difficulties. This non-contact storm water may be discharged through a sediment bag to remove uncontaminated sediment that may accumulate in storm water. An instance in which non-contact water would accumulate at the site would be water that accumulates on the covered excavation area during a storm event.

31

32 5.3.4 Erosion Control Schedule

33

34 Erosion/sedimentation control features will remain in place until completion of site restoration 35 activities as determined by the SAIC Construction Manager and approved by Ohio EPA. Inspection 36 of storm water controls will be performed by the Subcontractor on a daily basis during construction 37 activities. After site restoration has been completed, inspection of storm water controls will be 38 performed once every two weeks until 70 percent vegetation cover has been achieved and erosion 39 controls can be removed, as specified in Section 8.6 of this RD and the SWP3 (Attachment B). The 40 Subcontractor also will inspect the storm water controls within 24 hours of any rain event greater than 41 0.5 inches. For rain events lasting longer than 24 hours, the Subcontractor will also inspect storm 42 water controls at least every 24-hours of the event and within 24 hours of the event ending. These 43 inspections will be performed in accordance with the CQAP in Section 10 of this RD.

1 5.4 DUST AND WIND CONTROLS

2

3 All excavations, access roads, and all other work areas within the project boundaries will be 4 maintained free from soil that could cause a hazard or nuisance. Dust generation activities may occur 5 during clearing and grubbing, and material excavation, handling, and transportation. Dust control will be maintained by keeping traffic on improved roads, maintaining the posted speed limit, and 6 7 applying water as required. The Subcontractor will employ water spraying/misting for dust control if 8 airborne dust is observed. Water used for dust control will be clean (i.e., obtained from RVAAP 9 sources with approval of the RVAAP Facility Manager or potable water obtained from an off-site 10 source). The use of additives will not be permitted.

11

During instances of high winds resulting in excessive dust, additional dust control measures or work
stoppage may be required. The Subcontractor SSHO will be responsible for visual dust monitoring.
At a minimum, visually monitoring of fugitive dust emissions will be conducted daily during
representatively normal operating conditions.

- 16 17
- 5.5 GOOD HOUSEKEEPING
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Good housekeeping practices are designed to maintain a clean and orderly work environment. Goodhousekeeping measures will include at a minimum:

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- Regular pickup and disposal of garbage and sanitary waste material;
- Daily equipment and material inspections for leaks and/or conditions that could potential lead to a discharge of a petroleum product, chemical or waste;
- Perform preventative maintenance on equipment to ensure it is in proper operation and to detect potential leaks before they occur; and
- Ensure that spill cleanup procedures outlined in Section 12.1.2 of the Facility-Wide SHP (USACE 2001b) are understood by employees, contractors, and/or subcontractors, and establish storage areas are away from streams and water bodies. The storage area will also be away from direct traffic routes to prevent accidental spills.

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6.0	DRY SEDIMENT REMOVAL ACTIVITIES
This se	ection describes the remedial activities to be performed in support of this RD:
٠	Land survey;
٠	MEC Avoidance;
•	Excavation of contaminated dry sediment;
٠	Storm water controls; and
•	Equipment decontamination.
Design	Drawings (Attachment C) detailing remedial action requirements for the performance of dry
sedime	nt removal and associated activities are referenced as appropriate throughout this section.
If any	unsafe or unexpected site condition or material (e.g., MEC) is encountered during any phase of
the rer	nedial activities, work will stop immediately and the SAIC Project Manager, USACE COR
and the	e RVAAP Facility Manager will be notified immediately. The condition will be assessed and a
joint d	etermination will be made regarding continuation of remedial activities. Work will not resume
until a	pproval has been granted by the USACE COR. If the discovery results in a change to the
scope,	objectives, or schedule of this RD, SAIC will notify the USACE COR and the Ohio EPA
Project	Coordinator for concurrence on proposed revisions and/or corrective actions.
6.1	LAND SURVEY
	o the start of excavation activities, a surveyor will establish the initial horizontal limits of
	tion by land survey for each removal area. The excavation limits will be demarcated in
accord	ance with Attachment C, Drawing C-5.
(\mathbf{a})	
6.2	MEC AVOIDANCE
MEC e	encounters are not anticipated during the implementation of this remedial action. However, to
	MEC will not pose a safety or health threat, a MEC Avoidance Subcontractor will be on-site
	mobilization and remedial activities.
U	
The M	EC Avoidance Subcontractor (a U.S. Army and/or Department of Defense [DOD] certified
	echnician II) will perform a clearance of the areas to be disturbed during remedial action. The
	Avoidance Subcontractor will provide personnel specifically trained in MEC identification
	ive items, and/or ordnance. Prior to and during excavation activities, the on-site MEC
-	ance Subcontractor will be responsible for 1) inspecting the excavation areas for the presence
	C; 2) identifying items suspected of being MEC; and 3) contacting the Subcontractor SSHC
and SA	AIC Construction Manager of the discovery of MEC. The SAIC Construction Manager wil
	t the SAIC Project Manager, the USACE COR, and the RVAAP Facility Manager. In the
contac	
	that a MEC is identified in the area, activities will cease until the MEC Avoidance

1 0.5 EACAVATION	1	6.3	EXCAVATION
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- This section describes the excavation activities for the removal of dry sediment within the limits of
 excavation. The limits of excavation for LL12, presented in Attachment C, Drawing C-4, are based
 on visual observations of the extent of the removal areas in the Main Ditch, and a topographic survey
 conducted of the area. The current estimated in situ volume of dry sediment is 706 cubic yards.
- 8 The initial excavation will extend approximately one foot horizontally and vertically beyond the 9 modeled extents of the ditch into native soil, this will be determined by visual observation. The 10 vertical extent of the excavation will cease if bedrock is encountered.

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6.3.1 General Sequence of Excavation

- The general sequence of excavation is as follows:
 15
 16 1.) Land survey will be performed to establish the MI Sample Areas (Attachment C, Drawing C-5);
 18
 19 2.) Excavation of dry sediment (as presented on Attachment C, Drawing C-5);
 20
 - Excavated dry sediment will be directly loaded from the Main Ditch into on-road haul trucks. Any stockpiling of contaminated dry sediment shall remain within the excavation boundary;
- 4.) Confirmation samples will be collected upon completion of excavation activities (Section 7);
- 26 5.) A land survey will be conducted to verify the final extent of excavation;
- 6.) Grading and backfill will occur upon approval from the SAIC Construction Site Manager;
 and
 - 7.) The site will be restored in accordance with Section 8.0 and Attachment C, Drawing C-7.
- 33 6.3.2 Excavation Activities
- 34
- Excavation activities will be executed to reduce the handling of contaminated dry sediment and will include:

37 38

39

41

- Dewatering the excavation area (if necessary);
- Excavating the contaminated dry sediment within the defined extent; and
- Loading dry sediment into haul trucks for transfer to disposal facility.

An Excavation Competent Person, as defined by OSHA, will be on-site during the excavation of the
 Main Ditch to ensure the ground surface is stable during removal activities. If the ground surface is

not stable, shoring and/or sloping will be performed. At no time will personnel enter the excavation, as confirmation sampling will be accomplished remotely as described in Section 7.1 of this RD. If an event entry into the excavation does become necessary (e.g., to remove soil around existing sanitary line, MEC), excavation water shall be removed, and the Subcontractor's Excavation Competent Person must ensure that adequate controls are in place to protect personnel from cave-in. The side slopes shall be graded to no less than 1½ H: 1 V (34⁰) or appropriate shoring will be installed. Excavation cave-ins are not likely with an excavation of 1 ft into the ditch bottom.

8

9 The excavation area will be covered at the end of each work day. Impermeable covers will be used 10 by the Subcontractor to cover exposed dry sediment at the end of each work day and during periods 11 of inclement weather. The impermeable covers will be secured with sand bags (or equivalent).

12

Equipment will be staged or operated from non-contaminated areas only. The Subcontractor will ensure heavy equipment does not enter the excavation area. It is anticipated only the excavator bucket will require decontamination. Decontamination of the excavator bucket will be conducted in accordance with Section 6.4 of this RD. If it is determined that excavation equipment will need to enter the open excavation, the excavation equipment will be decontaminated in accordance with Section 6.4 of this RD.

19

During the loading process, care will be taken to not overfill the trucks, or spill dry sediment on the sides of the trucks. The haul trucks will be positioned over plastic sheeting to contain any dry sediment spilled during loading. Trucks will be inspected for dry sediment on the exterior of the truck bed. Dry sediment will be brushed off and captured prior to the truck exiting the loading area. All truck loads will be covered while en route to the disposal facility. On-road haul trucks transporting hazardous waste shall be lined as required by the disposal facility along with any other specific federal or state requirements (e.g., placarding).

27

Confirmation samples will be collected prior to restoration of open excavations (Section 7). The
 excavation areas will be restored in accordance with Section 8 of this RD upon approval from the
 SAIC Construction Manager.

31

No suspect or unexpected materials, such as drums or cylinders, are anticipated during excavation activities. If unexpected site condition or material is encountered during any phase of the remedial activities, construction activities will stop immediately and be reassessed in accordance with procedures outlined in the SSHP (Attachment A).

36

37 6.3.3 Dry Sediment Staging Area

38

A staging area for excavated dry sediment will not be necessary for the remedial activities at LL12 unless it determined that stockpiling is necessary to gain removal efficiency. The excavated dry sediment will be staged within excavation limits of the Main Ditch until trucks are available for loading. Existing soils below stockpiled dry sediment will be excavated and sampled in accordance with Sections 6 and 7 of this RD.

6.4 **DECONTAMINATION**

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Contact with contaminated dry sediment will be actively minimized. The Subcontractor will implement measures to prevent the tracking of material from the excavation. Equipment used to excavate and haul contaminated dry sediment will be decontaminated prior to contact with other materials and prior to demobilization off-site. Equipment that comes into contact with contaminated dry sediment will be decontaminated as follows:

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- The excavator bucket will be placed over the haul truck and washed with a pressure washer.
 Limited amounts of liquids (i.e., less than 30 gallons) will be used for decontamination
 activities performed over haul trucks. The Subcontractor will ensure free water is not present
 in the haul truck and there are no liquids escaping the truck bed. The Subcontractor will not
 use any liquid for decontamination that could potentially change the chemical profile of the
 contaminated dry sediment (such as, addition of solvents or pH).
- If additional excavation equipment is used during the remedial activities, the Subcontractor
 shall designate and install a plastic-lined sandbag bermed area. Excavation equipment will be
 placed within the bermed area lined with plastic sheeting and cleaned as described below.
- All loose dry sediment will be removed using a stiff-bristle brush or other device to dislodge
 visible dry sediment.
 - Steam clean equipment using potable water.
 - Allow equipment to air dry as long as possible.
 - Place equipment on clean plastic if immediate use is anticipated, or wrap in plastic to prevent contamination if longer-term storage is required.
- Loose dry sediment and wash water will be mixed with excavated dry sediment and placed
 into a haul truck for disposal (decontamination liquids will consist of less than 30-gallons per
 truck and will not change the chemical profile of the excavated material).
- 33

At the end of each day and during periods of non-operation (e.g., weekends) the excavator bucket will be wrapped with 6-mil (minimum thickness) low density polyethylene sheeting and bound using duct tape and/or wire in sufficient manner to prevent exposure to weather elements.

- 1 Prior to release of construction equipment from the site, the SSHO, or designee, will visually inspect
- 2 (and document) construction equipment with specific attention to:
- 3 4
 - Tires and wheels or tracks (as applicable);
- 5 Undercarriage (frame, axles);
- 6 Exterior surfaces (including steps, running boards);
- 7 Engine compartment; and
- 8 Operator compartment.

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1 7.0 CONFIRMATION SAMPLING

This section describes the process to verify that the remedial activities meet the established cleanup
goals. The purpose of the confirmation sampling is to provide data to confirm that the remedial
activities discussed in the previous sections attained the cleanup goals. Confirmation sampling
consists of two components:

- 7 8
- 1.) Sample collection and analyses; and
- 2.) Evaluation/comparison against the cleanup goals.
- 9 10
- 11 12

7.1 CONFIRMATION SAMPLE COLLECTION

At the completion of the excavation activities described in Section 6.3, the LL12 excavation area will be sampled in the three MI Sample Areas (L12-256M, L12-257M, and L12-258M). One MI sample will be collected from within the excavation footprint, as depicted on Attachment C, Drawing C-5.

16

17 The MI samples will be collected, processed, and analyzed. The sampling will be conducted 18 remotely to ensure personnel do not enter the excavated areas. This remote sampling will be 19 accomplished either by use of a decontaminated stainless-steel attachment to the excavator, or by 20 using extension rods on a soil probe. No less than 30 aliquots will be collected from either of these 21 devices within the specified MI area.

22 23

7.2 CONFIRMATION SAMPLING PROCEDURES

24

All the dry sediment collected during the MI sampling for each MI Sample Area is composited into a single sample and sent to a National Environmental Laboratory Accreditation Conference (NELAC) approved off-site laboratory. The sample will be dried, sieved, finely ground, and analyzed for the specified non-volatile constituent analyses. Sample grinding and analyses will be conducted at the fixed-base laboratory.

30

Figure 7-1 presents the sample identifying information that will be used. The confirmation samples collected will be considered dry sediment samples (0 to 0.5 ft BGS). Samples will be identified sequentially using the identification number system consistent with the remedial investigations. If a sample is not collected or is reassigned to a different location, a specific reason and notation will be

35 noted in the project field books.

San	nple Station Location Identification: XXXmm-NNN(n)-####-tt
XX	X = Area Designator
L12	e = Load Line 12
mm	= Sample Location Type
sd	= Sediment Sample Location
NN	N = Sequential Sample Location Number
	que, sequential number for each sample location beginning with Phase I RI stations and extending into any
sub	sequent investigative phases (i.e., 001 – 999)
(n) :	= Special Identifier
	ional use (as needed) to identify special sample matrices or sample location characteristics
M =	Multi-increment Sample
###	# = Sequential Sample Identification Number
	que, sequential number for each sample beginning with Phase I RI locations and extending into any
sub	sequent investigative phases (i.e., 0001 – 9999)
tt =	Sample Type
	= Sediment Sample

- 1
- 2

Figure 7-1. Sample Identification System

Table 7-1 presents the baseline sample identification listing. Analytical results of arsenic at LL12
will be compared against the cleanup goals.

- 5
- 6

Table 7-1. Sample Identification for LL12 Confirmation Sampling

Location	Station	Sample ID	Arsenic
MI Sample Area #1	L12-256M	L12sd-256M-####-SD	1
MI Sample Area #2	L12-257M	L12sd-257M-####-SD	1
MI Sample Area #3	L12-258M	L12sd-258M-####-SD	1

7 Sample Identifier #### will be chosen during field implementation to ensure a duplicate number is not used.

8 MI = Multi-increment

9 L12 = Load Line 12

10

11 The sampling and analysis requirement are summarized in Table 7-2, as well as, the anticipated

12 sample quantities and methods. Project Quantitation Levels (chemical concentration precision levels)

13 will be in accordance with the Facility-Wide Sampling and Analysis Plan (USACE 2001a).

								USACE	
			Field	Site			Total	QA	USACE
		Field	Duplicate	Source	Sampler	Trip	A-E	Split	Trip
Parameter	Methods	Samples	Samples	Water	Rinsates	Blanks	Samples	Samples	Blanks
ParameterArsenic,	Methods SW-846	Samples 4	Samples	Water 0	Rinsates	Blanks	Samples	Samples	Blanks

 $3 \quad A-E = Architect-Engineer$

4 QA = Quality Assurance

- 5 USACE U.S. Army Corps of Engineers
- 6

7 7.3 CONFIRMATION OF CLEANUP GOAL

8

9 The cleanup goal concentration for arsenic at LL12 is 31 mg/kg. The results of the confirmation 10 samples will be compared to the cleanup goals. If the confirmation sample results exceed the cleanup 11 goal, the following steps will take place:

11 12 13

14

15

- 1.) Excavation of the ditch bottom at that specific MI Sample Area will be expanded to an extent prescribed by the SAIC Construction Manager; and
- 2.) Confirmation sample(s) will be collected. It will be at the discretion of the SAIC
 Construction Manager to determine if multiple confirmation samples will be collected from
 the additional excavation area. The SAIC Construction Manager will create spacing for the
 sample areas and document which areas are represented by specific MI samples.
- 20

21 Site restoration activities will occur as MI Sample Areas are confirmed not to exceed cleanup goals.

- 22 Initiation of restoration activities will commence upon the approval from the SAIC Construction
- 23 Manager in conjunction with the USACE COR and Ohio EPA.

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1 8.0 SITE RESTORATION

2		
3	Site re	storation will begin after the analytical results of the confirmation samples confirm remedial
4	action	cleanup goals have been achieved. The Subcontractor will restore the site to the required
5	conditi	ons set forth in Attachment C, Drawing C-7. At a minimum, this will include:
6		
7	•	Grading and backfilling (where necessary) side-slopes of the Main Ditch to no less than $1 \frac{1}{2}$
8		$H: 1 V (34^{0});$
9		
10	•	Backfilling, compacting and leveling the bottom of the Main Ditch to the existing grade to
11		maintain drainage. It should be noted the intent of compacting the backfill is to match the
12		existing grade, flow pattern and aesthetics of the Main Ditch and not to achieve a specific soil
13		density;
14		
15	•	Installing erosion control matting (e.g., mulch mat) and seed on disturbed side slopes of the
16		Main Ditch;
17		
18	•	Placing one 6-in course of rip rap (4 to 6 inch stone) in the bottom of the Main Ditch for
19		erosion control;
20		
21	•	Grading, seeding, and mulching construction disturbed areas between Main Ditch and
22		railroad bed;
23		
24	•	Installing a straw check dam at north end of excavated area within the Main Ditch; and
25		
26	•	Removing erosion controls once vegetation is established.
27		
28	8.1	RE-GRADING AND BACKFILL
29		
30		ottom of the excavation area will be backfilled, compacted and graded to original contours to
31		in drainage. No less than one 6-in course of rip rap will be installed over the backfill to
32	-	t erosion. The side slopes of the Main Ditch shall be backfilled, and compacted in areas
33		ern portion) where existing side slopes are greater than $2 H : 1 V$. In the southern portion of the
34 25		Ditch, the side slopes shall be graded to no less than $1\frac{1}{2}$ H : 1 V. Backfill material used for
35		opes shall be able support vegetation. In the event the selected backfill material will not, the
36		ntractor will place at least 4-inches of topsoil over the backfill. Attachment C, Drawing C-7
37	presen	ts the contour specified for site restoration.
38 20	W/h area	noncompany mut and demonstration within the Construction Deve demote a track leading and
39 40		necessary, ruts and depressions within the Construction Boundary (e.g., truck loading area and uction support area) will be re-graded. The Subcontractor will use approved healtfill material
40 41		action support area) will be re-graded. The Subcontractor will use approved backfill material a restoration activities. Should the backfill material not be sufficient to support re-vegetation
41		e restoration activities. Should the backfill material not be sufficient to support re-vegetation

- 42 (e.g., clayey soil), a minimum of 4 inches of vegetative cover (e.g., topsoil) will be placed on the
- 43 backfill material prior to seeding and mulching.

- The Subcontractor will identify an off-site source of backfill. Per Ohio EPA guidance, one MI sample will be collected by SAIC for every 4,000 cubic yards of backfill or vegetative cover used. This quantity of backfill or vegetative cover must come from the same source or an additional sample must be collected. The samples will be analyzed for the parameters identified in Table 8-1. The backfill and vegetative cover must be approved by Ohio EPA. Project Quantitation Levels will be in accordance with the Facility-Wide SAP (USACE 2001a).
- 7
- / 0
- 8 9

Parameter	Methods
VOCs, TCL	SW-846 5030/8260B
SVOCs, TCL	SW-846 3540/8270C
Pesticides, TCL	SW-846 3540/8081A
PCBs	SW-846 3540/8082
Explosives	SW-846 3540/8330
Nitro-glycerine	SW-846 3540/8330
Nitro-guanadine	SW-846 3540/8330 Modified
Nitrocellulose	MCAWW353.2 Modified
Metals, TAL	SW-846 6010B/6010A/7471
pH	SW-846 9040/9045

- 10 PCB = polychlorinated biphenyl
- 11 SAP = sampling and analysis plan
- 12 SVOC = semivolatile organic compound
- 13 TAL = target analyte list
- 14 TCL = target compound list
- 15 VOC = volatile organic compound
- 16
- 17

Table 8-2. RVAAP Facility-Wide Background Criteria for Surface Soils

_	Background		Background		Background
Parameter	Criteria (mg/kg)	Parameter	Criteria (mg/kg)	Parameter	Criteria (mg/kg)
Aluminum	17,700	Cobalt	10.4	Nickel	21.1
Antimony	0.96	Copper	17.7	Potassium	927
Arsenic	15.4	Cyanide	0	Selenium	104
Barium	88.4	Iron	23,100	Silver	0
Beryllium	0.88	Lead	26.1	Sodium	123
Cadmium	0	Magnesium	3,030	Thallium	0
Calcium	15,800	Manganese	1,450	Vanadium	31.1
Chromium	17.4	Mercury	0.036	Zinc	61.8

18 mg/kg = milligram per kilogram

19

20 8.2 **REMOVAL OF PLACED STONE**

21

- 22 Any stone placed on the existing access roads or haul truck route at LL12 will not require removal.
- 23 However, the Subcontractor will remove any stone placed used to expand the equipment and material

storage area. Removed stone may be placed and graded on the existing access roads or disposed off site.

2

4 8.3 FINAL GRADING

Final grading will be performed to match surrounding elevations, prevent ponding of water, and
prevent erosion (Attachment C, Drawing C-7). The final grade of the excavation area, as well as, all
areas disturbed during remedial activities will be approved by the SAIC Construction Manager.

9 10

5

8.4 **RE-VEGETATION**

11

All disturbed areas must be seeded within seven days following excavation, backfilling, and final grading activities. The wetland areas shown in Attachment C, Drawing C-3 and the disturbed side walls of the Main Ditch shall be seeded with the mixture presented in Table 8-3. The walls of the Main Ditch shall be covered with erosion control matting (e.g., mulch mat) instead of straw.

- 16
- 17

Table 8-3. Full-Sun Stream/Ditch Seed Mixture for RVAAP/Camp Ravenna

Mixture %
10.0%
10.0%
20.0%
20.0%
10.0%
5.0%
2.0%
8.0%
9.0%
5.0%
0.5%
0.5%

Specifications:

Broadcast at 15lbs/acre

Mulch with a minimum of 3 bales of straw per 1,000 square feet.

18

19 The Subcontractor will use a Camp Ravenna-approved "open area" seed mixture for permanent cover

20 for construction areas disturbed during field activities. Table 8-4 presents the seed mixture and

21 application specifications. Fertilizer and lime are not needed for seeding with native seed mixes.

Table 8-4.	Open Area Seed Mixture for RVAAP/Camp Ravenna
------------	---

Seed Type	Mixture %
Nodding Wild Rye (Elymus Canadensis)	23.5%
Virginia wild rye (Elymus virginicus)	25%
Little Bluestem (Schizachyrium scoparium)	22%
Partridge Pea (Chamaecrista fasciculate)	18.75%
Thin-leaved Coneflower (Rudbeckia triloba)	7.75%
Brown fox sedge (Carex vulpinoidea)	1.5%
Black-eyed Susan (Rudbeckia hirta)	1.5%

Specifications:

Broadcast @ 18 lbs/acre, drilled at 12 lbs/acre

Mulch with a minimum of 3 bales of straw per 1,000 ft²

2

1

Other effective materials may be used, including specialized seeding products/technologies such as seed impregnated fiber matting. Any product or technology used for seeding the Main Ditch will meet the seeding requirements presented in Tables 8-3 and 8-4 and applicable Ohio EPA storm water pollution prevention controls.

7

8 8.5 REMOVAL OF EROSION CONTROLS

9

10 At the completion of the excavation, and prior to the removal of the dewatering berm/dam, the 11 Subcontractor will install a straw-bale check dam in the Main Ditch down gradient of the dewatering 12 berm to prevent sediment transport to the downgradient Active Area Channel. The check dam will 13 remain in place until grass coverage on the sidewalls of the Main Ditch is at least 70 percent 14 Other existing erosion control measures shall remain in place until the grass is established. 15 established with a density of at least 70 percent coverage, in accordance with Ohio Rainwater and Land Development guidance. Once SAIC confirms that at least 70 percent coverage has been 16 17 achieved, the Subcontractor is responsible for the removal and disposal of all erosion controls 18 measures at that time.

1 9.0 WASTE CHARACTERIZATION AND DISPOSAL

2

3 This section describes waste characterization, transportation, and waste disposal activities that will be 4 performed in support of implementing this RD. Waste includes remedial waste (e.g., excavated dry 5 sediment and excavation water) and any IDW generated during sampling activities. All waste will be properly handled, labeled, characterized, and managed in accordance with Section 7.0 of the Facility-6 7 Wide SAP, Federal and State of Ohio Large-Quantity Hazardous Waste Generator Requirements, and 8 RVAAP's Installation Hazardous Waste Management Plan. All waste will be appropriately 9 accounted for as soon as possible and prior to conclusion of the project. Any shipment of solid or 10 hazardous waste off-site will comply with all appropriate federal and state laws.

11 12

13

9.1 WASTE STREAM IDENTIFICATION

14 Waste generated during remedial activities will be managed to prevent the potential release of 15 contamination. The following types of waste may be generated:

16 17

21

24

25

- Vegetation;
- 18 Excavated dry sediment;
- 19 Decontamination fluids from sampling activities;
- Sanitary waste;
 - Personal protection equipment (PPE) and contact waste (e.g., plastic tarps, ground cloths);
- Excavation water, storm water or groundwater in direct contact with impacted dry sediment;
 and
 - Decontamination fluids generated during the decontamination of excavation equipment.
- No dry sediment IDW is anticipated during the collection of dry sediment characterization samples.
 The entire volume of dry sediment collected for these samples will be shipped to the laboratory. The
 laboratory will be responsible for the ultimate disposition of remaining dry sediment.
- In general, proper waste minimization procedures will be employed to limit the volume of waste
 generated. These procedures will include:
- 32 33
 - Re-use of materials that do not require decontamination;
- Utilization of disposable sampling tools that do not require decontamination;
- Minimization of the volume of decontamination fluids;
- Minimization of contact with potentially contaminated materials;
- Minimization of foot and vehicle traffic through potentially contaminated areas; and
- Utilization of good housekeeping practices.

1 9.2 WASTE STREAM MANAGEMENT

2 3

4

Table 9-1 presents and discusses each potential waste streams for this RD. Characteristics for each waste stream include: the point of generation, on-site staging and processing, characterization requirements, and method of final disposition.

- 5 6
- 7

Table 9-1. Waste Characterization and Disposal

Waste Stream	Point of	On-Site Staging	Characterization	Final
Identification	Generation	and Processing	Requirements	Disposition
Surface Vegetation	In area of	Trees greater than	No characterization	Roots and root balls within
(Trees and Shrubs)	excavation	four inches in	required.	the excavation foot print and
()	vegetation will be	diameter will be cut		wood chips used on-site for
	cut to a height of not	and stacked neatly at		absorbent material will be
	greater than three	the AOC away from		considered potentially
	inches above the	remedial activities.		contaminated material and
	ground surface.	Trees less than four		disposed with excavated dry
	8	inches in diameter		sediment.
		shall be cut into		
		manageable pieces		
		and chipped. Wood		
		chips not used for		
		absorbent material		
		will be spread over		
		the AOC by the		
		Subcontractor.		
Excavated Dry	Dry sediment will	Excavated dry	Characterization	Excavated dry sediment will
Sediment	be generated during	sediment will be	sampling of dry	be removed from the AOC
	the excavation and	directly loaded into	sediment will be	under a RVAAP signed
	remedial activities at	on-road haul trucks.	performed prior to	manifest by a licensed waste
	LL12.	Truck beds will be	mobilization and	disposal contractor and
		lined as required by	excavation activities.	disposed at an approved
		state, Federal	Samples will be	disposal facility permitted
		Department of	analyzed for TCLP to	by the state of Ohio to
		Transportation	determine	accept the waste.
		(DOT), or disposal	classification of	-
		facility	wastes (hazardous,	
		requirements.	non-hazardous).	
Decontamination	In the event that	Due to the	One representative	Removed from the AOC by
Fluids	disposable plastic	anticipated small	sample will be	a licensed waste disposal
(Sampling Activities)	scoops can not be	quantity generated,	collected and	contractor and disposed at
	used during	all IDW liquid will	characterized in	an approved disposal facility
	sampling, stainless-	be combined and	accordance with	permitted to accept the
	steel spoon and	contained in a	Section 7.4 of the	waste.
	bowls will be used	labeled DOT	Facility-Wide SAP	
	to collect samples.	approved 55-gal		
	These tools require	closed-top drum.		
	decontamination			
	between samples			
	resulting in the			
	generation of fluids.			

8

Waste Stream Identification	Point of Generation	On-Site Staging and Processing	Characterization Requirements	Final Disposition
Sanitary Waste Non-contaminated (i.e. garbage, paper waste, silt fence, and non-indigenous solids)	Primarily generated by personnel working at the site during remedial activities.	Collected daily in plastic-lined trash cans and moved to a designated area as specified in Section 7.3 of the Facility- Wide SAP	No characterization required.	Disposed in a licensed solid waste disposal facility in accordance with local, state and federal regulations.
PPE (gloves, boot covers) and Contact Waste (plastic sheeting)	Generated by the site workers on a daily basis.	PPE that comes into contact with hazardous material requires temporary disposal in 55-gallon drums and ultimate disposal at a permitted hazardous waste facility. PPE that does not come into contact with hazardous material will be collected in trash bags and disposed of daily in an RVAAP or project specific dumpster.	Characterized in accordance with Section 7.4 of the Facility-Wide SAP. Generally, PPE will be characterized for disposal based upon the dry sediment it was in contact with.	PPE will be disposed of in accordance with Section 7.5 of the Facility-Wide SAP (USACE 2001a). It will be disposed of as either sanitary waste or as a permitted hazardous waste in a permitted hazardous waste facility.
Excavation Water	Potentially generated in excavation area during rain events.	Accumulated excavation water will be pumped into a temporary water storage tank. Minimal quantities are anticipated given; the nominal footprint and depth of the excavation area, and the excavation footprint will be covered during inactivity.	If characterization sampling results of dry sediment indicate low concentrations of analytes, Ohio EPA may waive characterization sampling of excavation water. Should characterization sampling of excavation water be required; excavation water will be analyzed for parameters presented in Table 1-1 of FW SAP QAPP (USACE 2001a) ^c .	The Ohio EPA Project Coordinator will determine method of disposal from the following three choices: (1) land application (according to land application guidelines) ^a ; (2) sanitary sewer disposal ^b , or (3) discharge to a suitable waste disposal facility with approval from RVAAP/SAIC. Sediment collected in the bottom of the tank will be disposed of as excavated dry sediment.

Table 9-1. Waste Characterization and Disposal (continued)

Waste Stream	Point of	On-Site Staging	Characterization	Final
Identification	Generation	and Processing	Requirements	Disposition
Decontamination	Generated as a	Decontamination of	No characterization	Decon water will be
Fluids	result of	excavation	required.	disposed of in the haul truck
(Excavation	decontamination of	equipment will be		along with excavated dry
Equipment)	excavation	conducted over the		sediment.
	equipment during	truck bed of the final		
	and after all	haul truck upon		
	excavation remedial	completion of the		
	activities.	final haul excavation		
		activities. The		
		amount of water to		
		be used will be		
		minimized such that		
		water accumulation		
		in the haul truck will		
		not exceed the		
		requirements of the		
		disposal facility or		
		leak during		
		transport.		
		Should there be a		
		requirement for an		
		equipment		
		decontamination		
		pad, water generated		
		from this activity		
		will be collected and		
		stored with		
		excavation water.		

Table 9-1. Waste Characterization and Disposal (continued)

^aThe guidelines for land application of excavation water are as follows:

• Discharge will only occur in a grassy well vegetated area of the AOC (LL12) from which it was generated;

• Discharge rates will be kept at a minimum to reduce any ponding or puddling (a spreader bar may be utilized);

• Discharge will not be released directly into surface water (e.g., creeks, ditches, streams); and

• Any accidental release to a surface water body shall be immediately reported to Ohio EPA.

^bShould sample results be within sewer water pre-treatment standards, results will be submitted to the Portage County Water and Sewer District or other wastewater disposal agency for treatment approval.

^cThe parameters include VOCs, SVOCs, pesticides, PCBs, explosives, nitroquandine, nitrocellulose, PAHs, metals (TAL), and cyanide.

11 9.3 INVESTIGATION-DERIVED WASTE FIELD STAGING

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A Field Staging Area (FSA) will be designated at the beginning of field activities and approved by the RVAAP Facility Manager. A centralized FSA will be established for the staging of all drums of IDW. The FSA will be managed according to the requirements of Section 7.3 of the Facility-Wide SAP (USACE 2001a). Any excavation water will be containerized in a storage tank staged proximate to the removal areas in the event water accumulates in the excavated area.

18

Final inventories of IDW will be taken and provided to the RVAAP Facility Manager by the SAICConstruction Manager. All non-hazardous liquid waste not transported off of the facility within 30

days following project completion will require secondary containment. Any soil/sediment or liquid 1 2 waste identified as hazardous through process knowledge or characterization must be staged in the 3 designated RVAAP 90-day hazardous waste storage area and managed in accordance with facility 4 requirements, as described in Section 7.3 of the Facility-Wide SAP (USACE 2001a).

5

9.4 WASTE CONTAINERIZATION AND LABELING

6 7 8

All waste storage containers will be of suitable size, leak proof, and constructed of materials compatible with the materials to be contained. Waste storage containers will be properly labeled 10 prior to placement of material.

11

9

12 The Subcontractor will be responsible for providing new Department of Transportation (DOT) 13 approved containers for the liquid IDW. The Subcontractor will be responsible for the waste 14 characterization, container labeling, transportation and final disposal at a State of Ohio or Federal 15 approved treatment, storage, or disposal (TSD) facility of all decontamination liquids. The RVAAP 16 Facility Manager will sign all waste profiles and waste manifests for the disposal of project IDW to 17 approved disposal facility.

18

19 All IDW containers will be labeled prior to placing IDW in them. All IDW containers (drums) will 20 be labeled in accordance with Section 7.2 of the Facility-Wide SAP (USACE 2001a). Each IDW 21 container will be labeled to ensure easy identification and proper management. Prior to placing IDW 22 into a container, a "Pending Analysis" label containing the following information will be affixed to 23 the outside of the container:

- 24
- 25 Project name; •
- 26 Contents; •
- Date waste was first placed into the container; 27
- 28 Source location(s); and •
- 29 Emergency contact name and telephone number. •
- 30

31 All IDW containers will be closed and stored in the equipment storage area. Liquid IDW containers 32 will be filled to a maximum of 66% of the container volume and will be placed on spill containment 33 pallets. All IDW containers and pallets will be covered with a weather-proof tarp. All IDW 34 containers will be inspected to ensure no leaks or releases occur during use. An orange construction 35 fence will be installed around the IDW storage area.

Any non-contaminated sanitary trash will be contained separately in plastic-lined standard trash can
 with lid. Non-contaminated sanitary trash will disposed off-site through a commercial municipal
 waste service provided.

4 5

9.5 TRANSPORTATION, STORAGE, AND DISPOSAL

6

7 The management, transportation, and disposal of all waste streams will be coordinated with RVAAP. 8 All transportation paperwork (manifests or shipping papers) and on-road haul truck placards will be 9 prepared by the Subcontractor Construction Manager in accordance with federal, state, and local 10 regulatory requirements, and disposal facility requirements. A draft of the transportation paperwork 11 containing "base" information will be submitted to RVAAP/SAIC for review and approval a 12 minimum of one week prior to shipment of any material. The approved transportation paperwork will 13 then be completed as appropriate by the SAIC Construction Manager in the field during excavation 14 activities. The RVAAP Facility Manager will be responsible for custody of manifest copies and 15 submittal to Ohio EPA and United States Environmental Protection Agency (USEPA) as part of the 16 annual reporting for RVAAP hazardous waste generation and management.

17

18 Contaminated dry sediment loaded into on-road haul trucks will be transported by licensed waste 19 haulers to RVAAP and SAIC approved licensed off-site disposal facilities. All transportation 20 requirements, including proper labeling, placarding, and weight limits will be followed. All 21 manifests, shipping documents, and disposal facility approval letters will be provided to SAIC and 22 incorporated into the Construction Report.

23

All other waste types (e.g., IDW, other materials, and excavation water) will be managed by the Subcontractor in compliance with all federal, state and local laws. The RVAAP Facility Manager will sign all waste profiles and waste manifests for the disposal of project wastes at an approved facility. All manifests, shipping documents, and disposal facility approval letters will be provided to SAIC.

10.0	CONSTRUCTION QUALITY ASSURANCE PLAN
	ection presents the CQAP. The CQAP describes the inspection procedures and documentation d to ensure excavation, disposal, and restoration activities occur according to the requirements RD.
constru address	ols for reporting test results, certifying compliance with construction requirements, correcting action deficiencies, and documenting such corrections are provided. This section also sees the review and documentation requirements necessary to comply with the site restoration contained herein.
10.1	RESPONSIBILITY AND AUTHORITY
10.1.1	Responsibility
to imp respon	ganizational chart presented in Figure 2-1 outlines the management structure that will be used element the excavation and disposal activities in accordance with this RD. Functional sibilities of key personnel were described in Section 2.1. The assignment of personnel to each n was based on the following:
•	Qualifications;
•	Experience; and
•	Training.
will en	AIC QA/QC Officer and SAIC Construction Manager, in coordination with the USACE COR, sure the completed remedial activities conform to the RD, design drawings, specifications, and eccessary permit conditions. The SAIC Project Manager will verify completion of these es.
The SA	AIC Construction Manager will monitor excavation, disposal, and site restoration activities. AIC Construction Manager or designee will be on-site during work activities to ensure that all nents of this RD are fulfilled.
10 1 2	Administration and Opportion
10.1.2	Administration and Operation
The Q	A/QC organization is administered by the SAIC QA/QC Officer in concert with the SAIC
	uction Manager. The SAIC Construction Manager will be supported by the Subcontractor uction Manager and technical staff (engineers, scientists, and technicians) as necessary.
from r proced	ndors supplying materials used for site restoration and storm water control will supply materials nanufacturing facilities with established QC programs. Results of the manufacturer QC ures will be submitted to the QA/QC Officer for review, evaluation, and documentation prior nning field activities.

1 2

10.2 PERSONNEL QUALIFICATIONS

All QA/QC personnel will be properly trained for their job function. The SAIC Construction Manager is key to the inspection and certification program. The SAIC Construction Manager will have demonstrated knowledge of specific construction practices relating to earthwork, regulations and specifications, observation and testing procedures, and documentation procedures. The SAIC Construction Manager will also be experienced in performing similar duties on previous jobs in which comparable construction activities took place.

9

11

10

10.3 DAILY PLANNING BRIEFINGS

12 At the start of the project, the Subcontractor will participate in a pre-work briefing on objectives, 13 health and safety, proposed deviations, and project schedule with the SAIC Construction Manager.

14

In addition to daily tailgate briefings conducted in accordance with the SSHP, the Subcontractor and
 SAIC will participate in daily planning briefings to determine the plan of action for the work day.

17 This briefing will include at a minimum the following:

- 18
- A discussion of the planned activities for the work day;
- Planned area of excavation;
- Weather considerations;
- Deliveries;
- Transportation schedule;
- Schedule forecast; and
 - Issues which would result in an impact to the project.
- 25 26

The USACE COR and RVAAP Facility Manager, or authorized designees will be invited to attendthe pre-work briefing and any daily safety or planning briefings.

29 30

10.4 INSPECTION ACTIVITIES

31

Inspections will be completed to verify acceptability of materials, prevent spills, and assess effectiveness of storm water and dust generation controls. The scope and frequency of each type of

34 inspection is described below.

- 1 10.4.1 Spill Control
- 2

The SAIC Construction Manager will conduct daily inspections to verify spill equipment is maintained and no spills have occurred. During excavation, if any visually or olfactory indicators suggest the presence of potentially contaminated dry sediment, the employee will report to the SAIC Construction Manager. The Subcontractor will provide all necessary on-site spill equipment (e.g., granulated clay, absorbent blankets, PPE, shovels, containers). All on-site workers will maintain good housekeeping practices (as discussed in Section 5.5).

9

Spills will be responded to as presented in Section 12.1.2 of the Facility-Wide Safety and Health Plan and the RVAAP Installation Spill Contingency Plan. In the event of a spill or leak, the employee making the discovery will immediately notify the SSHO and the SAIC Construction Manager. These spills can include, but are not limited to, releases of fuels, lubricants, and hydraulic fluids.

14

15 The SAIC Construction Manager will ensure the spill is reported to Camp Ravenna Operations and 16 RVAAP Army Staff as well ensure the incident is documented on a Camp Ravenna Spill Incident 17 Reporting Form.

18

19 10.4.2 Storm Water Controls

20

Prior to construction activities, the Subcontractor will install and inspect all storm water controls (including the collection system for any excavation water encountered) and document proper placement in accordance with the requirements of this RD, SWP3 (Attachment B), and associated drawings (Attachment C) and specifications. Any water (e.g., storm water) in contact with an open excavation will be collected, containerized, sampled, characterized, and managed by the Subcontractor.

27

All employees will practice due diligence to prevent any damage to the storm water control measures. The Subcontractor will conduct routine walkovers during normal operations to evaluate the integrity of the storm water controls. Any deficiencies will be immediately corrected and documented in the daily report. Inspection of storm water controls will be performed by the Subcontractor on a daily basis. After remedial activities are completed, storm water controls will be inspected bi-weekly, within 24 hours of a storm event (0.5 inches or greater), and at least every 24 hours during extended rain events.

35

36 **10.4.3 Dust Control**

37

Dust generation activities may occur during excavation, material handling, and equipment movement on paved and unpaved roads. The Subcontractor will minimize dust generation by keeping vehicles on improved roads, limiting speeds to a 10 mph maximum on the access roads, and application of water for dust suppression purposes as required. Water used for dust control will be clean (e.g., obtained from sources with approval of the SAIC Construction Manager or potable water obtained from an off-site source). The use of additives will not be permitted. Engineering controls will be 1 implemented to minimize the potential for dust generation. The Subcontractor SSHO will conduct

2 daily inspections during representatively normal operating conditions as described in Section 5.4 and

- 3 the SSHP.
- 4

5 10.4.4 Survey

6

7 Upon completion of excavation and disposal activities, the Main Ditch will be surveyed to document 8 the vertical and horizontal extents of the removal activities. At a minimum, the survey will contain 9 the cross sections shown in Attachment C, Drawing C-5. An Ohio licensed surveyor will conduct a 10 survey of excavation extent to be included as as-built drawings in the Construction Report. The 11 horizontal and vertical survey tolerance will be ± 0.1 ft. The excavation coordinates are in Ohio State 12 NAD 83 ft.

13

15

14 **10.4.5** Site Restoration

Once excavation activities have been completed and approved by the SAIC Construction Manager, in conjunction with the USACE and Ohio EPA, excavation will be backfilled and graded to create the original drainage pattern in the drainage ditch. The Subcontractor will submit data for materials to be brought on site (e.g., backfill, topsoil) a minimum of 7 days calendar prior to placing materials. USACE/SAIC will review material certifications for the backfill material, vegetative cover, and seed in accordance with Section 7 and Attachment C, Drawing C-7. The Subcontractor will obtain and apply the seeding mixture as prescribed within Section 8.5.

23

24 **10.5** SPILL RESPONSE

25

26 Spills will be responded to as presented in Section 12.1.2 of the Facility-Wide Safety and Health Plan. 27 In the event of a spill or leak, the employee making the discovery will immediately notify the SSHO 28 and the SAIC Construction Manager. These spills can include, but are not limited to, releases of 29 fuels, lubricants, and hydraulic fluids. The SAIC Construction Manager will determine whether the 30 leak poses an environmental risk or will exceed the capacity of on-site personnel and equipment. In 31 the unlikely event that there is a probability that the spill will extend beyond the immediate area, 32 result in an environmental insult, or exceed the capabilities of the on-site personnel, the SAIC 33 Construction Manager will inform the local fire department and hazardous materials response team. 34 If this is not the case, the on-site spill kit will be utilized to clean up the spill.

35

36 10.6 CONFIRMATION REQUIREMENTS

37

38 **10.6.1 Confirmation Sampling**

39

Confirmation sampling will be performed in accordance with Section 7 of this RD and the FacilityWide SAP (USACE 2001a) to demonstrate achievement of the remedial cleanup goals. Confirmation

samples will be analyzed for arsenic concentrations at LL12 by an approved off-site analyticallaboratory.

1	10.6.2 Verification of Achievement of Performance Criteria
2 3	The SAIC Construction Manager will confirm the results meet the cleanup goals. The USACE COR
3 4	and Ohio EPA Project Coordinator will be notified of the evaluations and results. If any sample does
5	not meet the cleanup goals, the evaluation will include a description of the additional excavation
6	based on the approach described in Section 7.3. Confirmation sampling results will be included in the
7 8	Construction Report.
9 10	10.7 DOCUMENTATION
11	10.7.1 Field Documentation
12	
13 14	This project will include daily inspection and quality summary reports, which will be signed and dated by the SAIC Construction Manager. These reports will be submitted to the SAIC Project
14 15	Manager.
16	Manager.
17	The daily reports may include:
18	
19	• Summary of activities performed at the project site;
20	• Daily Subcontractor Inspection activities (e.g., storm water controls, spill-control barriers,
21	equipment staging/fueling areas);
22	• Weather information;
23	• Departures from the approved RD;
24	Problems encountered during field activities;
25	• Subcontractor submittals; and/or
26 27	• Subcontractor certifications (e.g., health and safety records).
28	Copies of the construction activity forms, checklists and daily reports are included in Attachment D.
29 20	1072 Domedial Action Depart
30 31	10.7.2 Remedial Action Report
32	Upon completion of remedial activities, a Construction Report will be prepared by SAIC. The
33	Construction Report will document:
34	
35	• The project was performed in accordance with this RD (i.e., complied with requirements,
36	technical specifications, construction drawings, and other relevant contract documents), and
37	all applicable regulations, including surface water and air regulations;
38	
39	• Documentation of any approved field variances from this RD (e.g., unforeseen site condition,
40	change in material); and
41	
42	Corrective actions and achievement of remedial goals.

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1 **11.0 PROJECT SCHEDULE**

2

Implementation of this RD will be contingent on its approval, and that of the Record of Decision for
Soil and Dry Sediment at the Load Line 12 (RVAAP-12) at the Ravenna Army Ammunition Plant,
Ravenna, Ohio (USACE 2009). The start date may change based on these approvals.

6

Generally, construction activities shall occur during daylight hours (i.e., 8:00 a.m. to 5:00 p.m.) on a
5-days per week schedule. Preparation of the Construction Report shall follow conclusion of site
restoration activities. The anticipated project schedule is presented in Figure 11-1.

10

ID	Task Name	Duration	Start	Finish	Predecessors		2010
1	Remedial Design Reviews and Approval	136 days	Mon 7/13/09	Wed 11/25/09		Jul Sep Nov	Jan Mar May Jul Sep
2	Prepare and Submit Draft to Army and Ohio EPA	1 day	Mon 7/13/09	Mon 7/13/09		I)	
3	Army and OH EPA Review	45 days	Tue 7/14/09	Thu 8/27/09	2	2	
4	Comment Resolution Meeting	15 days	Fri 8/28/09	Fri 9/11/09	3	ð	
5	Prepare and Submit Final to USACE	30 days	Fri 8/28/09	Sat 9/26/09	3	1 to 1	
6	USACE Preliminary Review of Final	10 days	Sun 9/27/09	Tue 10/6/09	5	ठ	
7	Prepare and Submit Final to Army and Ohio EPA	5 days	Wed 10/7/09	Sun 10/11/09	6	7	
8	Army and OH EPA Review and Approval	45 days	Mon 10/12/09	Wed 11/25/09	7	1 ton	
9	Implement Remedial Action	33 days	Thu 11/26/09	Mon 12/28/09		-	v
10	Mobilization and Site Preparation	5 days	Thu 11/26/09	Mon 11/30/09	8	ें हैं	
11	Excavation, Transportation, and Disposal of Sediment	10 days	Tue 12/1/09	Thu 12/10/09	10	5	
12	Collect Confirmation Samples/Laboratory Analysis	10 days	Fri 12/11/09	Sun 12/20/09	11	0	
13	Ohio EPA Review of Confirmation Samples	4 days	Mon 12/21/09	Thu 12/24/09	12		ĥ
14	Site Restoration	4 days	Fri 12/25/09	Mon 12/28/09	13		শ
15	Final Close Out Report	250 days	Tue 12/29/09	Sat 9/4/10			0
16	Prepare and Submit PreDraft to USACE	30 days	Tue 12/29/09	Wed 1/27/10	14		τ, the second s
17	Reviews and Approval	220 days	Thu 1/28/10	Sat 9/4/10	16		č

11 12

Figure 11-1. Project Schedule

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1

Attachment A

Site Safety and Health Plan for the Draft Remedial Design for RVAAP-12 Load Line 12

Ravenna Army Ammunition Plant, Ravenna, Ohio

GSA Contract No. GS-10F-0076J Delivery Order No. W912QR-05-F-0033

Prepared for:

U.S. Army Corps of Engineers 600 Martin Luther King, Jr. Place Louisville, Kentucky 40202

Prepared by:

SAIC Engineering of Ohio, Inc 8866 Commons Boulevard Twinsburg, Ohio 44087

July 13, 2009

APPROVALS

Draft

Site Safety and Health Plan for the Remedial Design for RVAAP-12 Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio

July 2009

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July 8, 2009

Date

July 8, 2009

Date

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1		ACRONYMS AND ABBREVIATIONS
2		
3	ACGIH	American Conference of Governmental Industrial Hygienists
4	AOC	Area of Concern
5	Camp Ravenna	Camp Ravenna Joint Military Training Center
6	CIH	Certified Industrial Hygienist
7	COPC	Constituent of Potential Concern
8	CPR	Cardiopulmonary Resuscitation
9	CSP	Certified Safety Professional
10	EH&S	Environmental, Health and Safety
11	E&I	Engineering and Infrastructure
12	FBQ	Fuze and Booster Quarry
13	FS	Feasibility Study
14	FSHP	Facility Wide Safety and Health Plan
15	HAZWOPER	Hazardous Waste Operations and Emergency Response
16	H&S	Health and Safety
17	HTRW	Hazardous, Toxic, and Radioactive Waste
18	IDW	Investigation-Derived Waste
19	IRP	Installation Restoration Program
20	LL12	Load Line 12
21	MEC	Munitions and Explosives of Concern
22	MI	Multi-Increment
23	MSDS	Material Safety Data Sheet
24	NGB	National Guard Bureau
25	OE	Ordnance and Explosive
26	OEW	Ordnance and Explosive Waste
27	OHARNG	Ohio Army National Guard
28	Ohio EPA	Ohio Environmental Protection Agency
29	OJT	On-the-Job Training
30	OSHA	Occupational Safety and Health Administration
31	PCB	Polychlorinated Biphenyl
32	PID	Photoionization Detector
33	PPE	Personal Protective Equipment
34	ppm	parts per million
35	RA	Remedial Action
36	RI	Remedial Investigation
37	RRSE	Relative Risk Site Evaluation
38	RVAAP	Ravenna Army Ammunition Plant
39	SAIC	Science Applications International Corporation
40	SSHO	Site Safety and Health Officer
41	SSHP	Site Safety and Health Plan
42	TBD	To Be Determined
43	USACE	U.S. Army Corps of Engineers
44	UXO	Unexploded Ordnance

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1 1.0 INTRODUCTION

2

3 Science Applications International Corporation's (SAIC's) formal policy, stated in the 4 Environmental, Health and Safety Program manual, is to take every reasonable precaution to protect 5 the health and safety of our employees, the public, and the environment. To this end, the Ravenna 6 Army Ammunition Plant (RVAAP) Facility-Wide Safety and Health Plan (FSHP) (USACE 2001) 7 and this Site Safety and Health Plan (SSHP) collectively set forth the specific procedures required to 8 protect SAIC and SAIC subcontractor personnel involved in the field activities. These plans are 9 driven by requirements contained in the most current revisions of the U.S. Army Corps of Engineers 10 (USACE) Safety and Occupational Health Requirements for Hazardous, Toxic, and Radioactive 11 Waste (HTRW) Activities, ER-385-1-92, Safety and Health Requirements for Munitions and 12 Explosives of Concern, EM-385-1-95, and the USACE Safety and Health Manual, EM-385-1-1, 13 which are available online via the USACE web site. SAIC activities are also subject to the 14 requirements of the SAIC Corporate Environmental, Health and Safety Program and associated 15 procedures. In addition, subcontractors are responsible for providing their employees with a safe work place and nothing in these plans relieves such subcontractors of this responsibility. Subcontractors 16 17 must have and use their own safety programs and plans in compliance with applicable regulations. 18

19 The FSHP addresses program issues and hazards and hazard controls common to the entire 20 installation. This SSHP Addendum to the FSHP serves as the lower tier document addressing the

21 hazards and controls specific to the Remedial Action (RA) at the Load Line 12 (LL12) (RVAAP-12).

22 Copies of the FSHP and SSHP Addendum will be present at the work site during all fieldwork.

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1 2.0 FACILITY DESCRIPTION AND CONTAMINATION

2 CHARACTERIZATION

3 4

5

2.1 FACILITY DESCRIPTION

6 When the RVAAP Installation Restoration Program (IRP) began in 1989, RVAAP was identified as a 7 21,419-acre installation. The property boundary was resurveyed by Ohio Army National Guard 8 (OHARNG) over a 2-year period (2002 and 2003) and the total acreage of the property was found to 9 be 21,683.289 acres. As of February 2006, a total of 20,403 acres of the former 21,683-acre RVAAP 10 has been transferred to the National Guard Bureau (NGB) and subsequently licensed to OHARNG for 11 use as a military training site.

12

The current RVAAP consists of 1,280 acres scattered throughout the OHARNG Camp Ravenna Joint 13 14 Military Training Center (Camp Ravenna). Camp Ravenna is in northeastern Ohio within Portage and Trumbull Counties, approximately 4.8 km (3 miles) east-northeast of the City of Ravenna and 15 approximately 1.6 km (1 mile) northwest of the City of Newton Falls. The RVAAP portions of the 16 property are solely located within Portage County. RVAAP/Camp Ravenna is a parcel of property 17 18 approximately 17.7 km (11 miles) long and 5.6 km (3.5 miles) wide bounded by State Route 5, the 19 Michael J. Kirwan Reservoir, and the CSX System Railroad on the south; Garret, McCormick, and 20 Berry roads on the west; the Norfolk Southern Railroad on the north; and State Route 534 on the east 21 (Figure 1). Camp Ravenna is surrounded by several communities: Windham on the north; 22 Garrettsville 9.6 km (6 miles) to the northwest; Newton Falls 1.6 km (1 mile) to the southeast; 23 Charlestown to the southwest; and Wayland 4.8 km (3 miles) to the south.

24

When RVAAP was operational, Camp Ravenna did not exist and the entire 21,683-acre parcel was a government-owned, contractor-operated industrial facility. The RVAAP IRP encompasses investigation and cleanup of past activities over the entire 21,683 acres of the former RVAAP. References to RVAAP in this document are considered to be inclusive of the historical extent of RVAAP, which is inclusive of the combined acreages of the current Camp Ravenna and RVAAP, unless otherwise specifically stated.

31

The installation was active from 1941 to 1992. Activities included loading, assembling, storing, and packing military ammunition; demilitarization of munitions; production of ammonium nitrate fertilizer; and disposal of "off-spec" munitions. Various munitions were handled on the installation including artillery rounds of 90 mm or more and bombs up to 2,000 lbs.

36

In addition to production and demilitarization activities at the load lines, other areas of concern (AOCs) at RVAAP were used for the burning, demolition, and testing of munitions. These burning and demolition grounds consist of large parcels of open space or abandoned quarries. Potential contaminants at these AOCs include explosives, propellants, metals, waste oils, and sanitary waste. Other types of AOCs present at RVAAP include landfills, an aircraft fuel tank testing facility, and various general industrial support and maintenance facilities

42 various general industrial support and maintenance facilities.

1 2.2 LOAD LINE 12 DESCRIPTION

2

3 Load Line 12 covers about 80 acres in the southeastern portion of RVAAP. Load Line 12 was 4 originally known as the Ammonium Nitrate Plant and started operations on November 25, 1941. Structures related to the production of the ammonium nitrate were the Neutral Liquor Building 5 6 (Building FF-19) and seven evaporation/crystallization units (Buildings 900, 901, 902, 903, 904, 905, 7 and 906). Other structures, such as Water Works No. 2 and Power House No. 3 (Building FE-17), 8 housed support operations. The western half of the LL12 contained former production areas. The 9 eastern half was previously cleared, but did not contain any known production facilities. The RIs also 10 identified an area immediately north of the LL12 (informally termed the Team Track Area) that was 11 apparently used for offloading and staging of materials used in Load Line 12 production activities.

12

In May 1943, production of ammonium nitrate was terminated. From 1946 to 1950, a private contractor leased Load Line 12 to produce fertilizer-grade ammonium nitrate. From 1965 to 1967, a private contractor leased Building FF-19 for the production of aluminum chloride. The U.S. Army terminated the lease early due to environmental concerns related to air emissions and wastewater discharges to Upper and Lower Cobbs Ponds.

18

In June 1944, Buildings 900, 904, and 905 were converted for demilitarization of munitions. Rinsate from demilitarization operations was initially allowed to flow out of the buildings and directly onto the ground or to drainage ditches. In 1981, the Load Line 12 Pink Water Treatment Plant was built to treat the demilitarization effluent prior to discharge. After the termination of demilitarization operations, the treatment plant was used under a National Pollutant Discharge Elimination System permit to treat explosives-tainted storm water from Load Line 12 and other RVAAP locations.

25

Currently, there are no above-grade structures remaining at the LL12. Demolition of Buildings 901, 902, 906, and FF-19 took place between 1973 and 1975. Building FN-54 (bagging and shipping facility) was demolished in the 1980s. In 1999, approximately 1,500 ft³ of soil was removed from four pits near Building 904 and taken to a former warehouse at Load Line 4 as part of an explosives composting pilot study. Demolition of all remaining structures took place between 1998 and 2000. A former blast berm near Building 903 was removed and used as fill/groundcover for areas around Buildings 903 and FE-17.

33

34 2.3 PREVIOUS ACTIVITIES

35

Previous investigations at LL12 include a Relative Risk Site Evaluation (RRSE); a Phase I and Phase II Remedial Investigation (RI), which involved comprehensive sampling of soil, sediment, groundwater, and surface water within the site to define the nature and extent of contamination at LL12; a supplemental groundwater investigation; and a Feasibility Study (FS) to evaluate remedial alternatives for LL12. No previous RAs have been conducted at LL12.

1 2.4 PROJECT SCOPE

2 3

4

The scope of the RA at LL12 is to remove dry sediment from a manmade ditch until the concentration of arsenic is at or below the remedial cleanup goal of 31 mg/kg. To perform the scope outlined in the remedial design, SAIC and subcontractors will perform the following tasks:

- 5 6 7
- Site survey and utility clearance;
- Mobilization (e.g., clearing and grubbing, installing rock, sandbag berm and storm water controls);
- Environmental multi-increment (MI) sampling of dry sediment within the ditch;
- Excavation of dry sediment from the drainage ditch;
- Transportation and disposal of contaminated dry sediment;
- Confirmation MI sampling of dry sediment (to be accomplished remotely via excavation
 bucket or other determined remote sampling method);
- Survey of removal area;
- Site restoration (e.g., grading, backfilling, compacting, seeding, and installation of storm water controls); and
 - Demobilization.
- 18 19
- Concomzation.

Potential hazards posed by the planned tasks include injury from ordnance and explosives; lifting, and
 strain hazards associated with operating soil sampling equipment; heavy equipment; noise;
 excavation; excavation entry; fuel or decontamination solvent fires; chemical exposure; temperature
 extremes; stinging/biting insects; poisonous plants; and snakes.

24

25 The potential for chemical overexposure appears to be very low, based on the nature of planned tasks 26 and review of available data. There is some potential for chemical exposures via the inhalation 27 pathway and dermal contact with contaminated dry sediment during sampling and excavation 28 activities. Potential airborne exposures will be visually monitored during sampling and excavation 29 activities. Sampling crews will use protective gloves to handle potentially contaminated materials, 30 and, if necessary, the Site Safety and Health Officer (SSHO) will upgrade the required personal 31 protective equipment (PPE) to prevent inhalation and/or dermal contact with potentially contaminated 32 materials. The SSHO will observe all site tasks during daily safety inspections and will use 33 professional judgment and appropriate monitoring results to determine if upgrading PPE is required. 34 A detailed analysis of these hazards and specific appropriate controls is presented in Table 3-2.

35

This remedial action will be performed in Level D PPE using chemical-resistant gloves when handling potentially-contaminated materials. If one of several action levels is exceeded or the potential for increased risk becomes apparent during the investigation, protective procedures, including protective clothing, will be upgraded as necessary by the SSHO.

1 2.5 CONTAMINANTS

2

3 Table 2-1 lists constituents of potential concern (COPCs) and their respective maximum 4 concentrations detected in soil and dry sediment samples (discrete and MI) during previous remedial 5 investigations. Inclusion in this table indicates the potential to encounter a contaminant during the 6 remedial activities, but it does not necessarily indicate that the contaminant is present in sufficient 7 quantity to pose a health risk to workers.

- 8
- 9

Analyte	Units	LL12 Maximum Detect
	Metals	
Aluminum	mg/kg	197,000
Arsenic	mg/kg	418
Manganese	mg/kg	8700
0	organics-Explosiv	es
2,4,6-Trinitrotoluene	mg/kg	1400
2,6-Dinitrotoluene	mg/kg	1.7
RDX	mg/kg	21
	PCBs	
Aroclor-1016	mg/kg	3.3
Aroclor-1254	mg/kg	11
Aroclor-1260	mg/kg	8.2
Or	ganics-Semi-Vola	ıtile
Benz(a)anthracene	mg/kg	28
Benzo(a)pyrene	mg/kg	24
Benzo(b)fluoranthene	mg/kg	27
Dibenz(a,h)anthracene	mg/kg	3.2
Indeno(1,2,3-cd)pyrene	mg/kg	13

Table 2-1. LL12 Maximum Concentrations of Constituents of Potential Concern

Data is from *Phase I and II Remedial Investigation Reports for Load Line 12* (*RVAAP-12*). Ravenna Army Ammunition Plant, Ravenna, Ohio. Delivery Order W912QR-05-F-0033, February 1998 and March 2004, and *Final Feasibility Study for Load Line 12 at Ravenna Army Ammunition Plant in Ravenna, Ohio.* March 2006.

Airborne contaminant concentration calculations were conducted using the maximum detected concentration. Results indicated that concentrations were too low to represent an airborne exposure health risk.

PCBs = Polychlorinated Biphenyls

3.0 HAZARD/RISK ANALYSIS

The purpose of the task hazard/risk analysis is to identify and assess potential hazards that may be encountered by personnel, and to prescribe required controls. Table 3-1, a general checklist of hazards that may be posed by this project, indicates whether a particular type of hazard is present. If additional tasks or significant hazards are identified during the work, this document will be modified by addendum or field change order to include the additional information.

8

1 2

9

Yes	No	Hazard	
	X	Confined space entry	
Х		Excavation entry (excavation will be entered by subcontractor	
		only)	
X		Heavy equipment (drill rigs, backhoe)	
Х		Fire and explosion (fuels)	
Х		Electrical shock (utilities and tools)	
Х		Exposure to chemicals (contaminants and chemical tools)	
Х		Temperature extremes	
X		Biological hazards (poison ivy, Lyme disease, West Nile disease)	
	X	Radiation or radioactive contamination	
Х		Noise (excavation equipment, powered auger, drill rig)	
Х		Drowning	
Х		OE (potential to encounter unexploded ordnance)	

10

OE = ordnance and explosives

11

12 Specific tasks are as follows:

13 14

15

16

• Excavation using heavy equipment performed by the Subcontractor;

Surveying performed by the Subcontractor;

- Remote dry sediment sampling performed by SAIC (potentially utilizing the excavator bucket);
- Vegetation clearing with chainsaws, machetes, and sling blades, as required, performed by
 the Subcontractor;
- 19

•

• Investigation-derived waste handling and disposition performed by the Subcontractor; and

- Equipment decontamination performed by both SAIC and the Subcontractor.
- 21 22 23

20

3.1 POTENTIAL EXPOSURES

24

Prior sampling results indicate that the primary contaminant of concern at LL12 is arsenic. Table 3-2 contains information on the potential contaminant, as well as the reagents and chemicals that will be used for the project. It is important to note that the contaminants listed in Table 3-2 have been detected at a number of locations at RVAAP and might be expected to occur at any former operations

- 1 area. Exposure to chemical tools, such as corrosive sample preservatives, field laboratory reagents, or
- 2 flammable fuels is a possibility and will be controlled through standard safe handling practices.
- 3 4

5

3.2 TASK-SPECIFIC HAZARD ANALYSIS

- 6 Table 3-3 presents task-specific hazards, relevant hazard controls, and required monitoring, if
- 7 appropriate, for all of the planned tasks.

Table 3-2. Potential Exposures

Chemical ^a	TLV/PEL/STEL/IDLH ^b	Health Effects/ Potential Hazards ^c	Chemical and Physical Properties ^c	Exposure Route(s) ^c
Arsenic	TLV/TWA: 0.005 mg/m ³ , A3	Potential carcinogen per NIOSH,	Silver-gray or tin-white, brittle,	Inhalation
	PEL/TWA: 0.010 mg/m ³	ulceration of nasal septum,	odorless solid	Absorption
	IDLH: 5 mg/m ³	dermatitis, gastrointestinal	FP: NA; IP: NA	Ingestion
		disturbances, peripheral neuropathy, respiratory irritation,		Contact
Gasoline (used for fuel)	TLV/TWA: 300 ppm, A2	Potential carcinogen per NIOSH,	Liquid with aromatic odor;	Inhalation
	IDLH: Ca	dizziness, eye irritation, dermatitis	FP: -45°F; VP: 38-300 mm	Ingestion
			UEL: 7.6% LEL: 1.4%	Absorption
				Contact
Hydrochloric acid (potentially used to preserve water samples or for equipment decontamination)	TLV: 5 ppm ceiling IDLH: 50 ppm	Irritation of eyes, skin, respiratory system	Liquid; VP: fuming; IP: 12.74 eV; FP: none	Inhalation Ingestion Contact
Liquinox (used for	TLV/TWA: None	Inhalation may cause local irritation	Yellow odorless liquid	Inhalation
decontamination)		to mucus membranes	(biodegradable cleaner); FP: NA	Ingestion
Methanol (potentially used for equipment decontamination)	TLV/TWA: 200 ppm Skin notation IDLH: 6000 ppm	Irritation of eyes, skin, respiratory system; headache; optic nerve damage	Liquid; VP: 96 mm; IP: 10.84 eV; FP: 52°F UEL: 36% LEL: 6.0 %	Inhalation Absorption Ingestion Contact

^aThe potential chemicals were obtained from the Phase I and Phase II Remedial Investigation Reports for LL12 (USACE 1998, 2004).

^bFrom 2008 Threshold Limit Values, American Conference of Governmental Industrial Hygienists.

^cFrom NIOSH Guide to Chemical Hazards web site.

A2 = suspected human carcinogen.

- A3 = not classifiable as a human carcinogen. Ca = potential occupational carcinogen.
- eV = electron volts
- FP = flash point

IDLH = immediately dangerous to life and health

IP = ionization potential

LEL = lower explosive limitSTEL = short-term exposuremm = millimeterslimitNA = not applicableTLV = threshold limit valueNIOSH = National Institute for Occupational Safety andTWA = time-weighted averageHealth.UEL = upper explosive limitPEL = permissible exposure limit.VP = vapor pressureppm = parts per millionVP

Safety and Health Hazards	Controls	Monitoring Requirements
	Civil Surveys and Visual Surveys in Potentially Contaminated Areas	·
General safety hazards (moving equipment, slips, falls)	Level D PPE: long pants, shirts with sleeves, safety glasses, safety shoes or boots, and hard hats if overhead hazards are present (see Section 5.0 of the FSHP). Site-specific training, buddy system, proper housekeeping.	Daily safety inspections
Excavation Entry	Contractor will have an excavation competent person on-site per OSHA Excavation Standard 29 CFR 1926 subpart P. The excavation competent person will observe all site tasks during daily safety inspections and will use professional judgment and appropriate monitoring results to determine if excavation work is safe. The excavation competent person shall not at any time enter the excavation. Contractor personnel who enter the excavation shall follow OSHA Excavation Standard 29 CFR 1926 subpart P.	Daily safety inspections and visual surveys
Contact with OE	Pre-entry screening survey and continuous escort by OE specialist support following requirements of <i>Safety and Health Requirements for Munitions and Explosives of</i> <i>Concern (MEC), ER-385-1-95.</i> On-site training in ordnance recognition for all field personnel. Withdrawal of all SAIC and subcontractor personnel from immediate area and field marking of suspect area if ordnance or suspected ordnance is discovered	Visual and instrument surveys for ordnance conducted by OE expert personnel
Exposure to chemicals	 Nitrile or similar gloves for contact with potentially contaminated material. Gloves will be disposed after single use. Wash face and hands and any other exposed areas prior to taking anything by mouth. Hazardous waste site operations training and medical clearance. Site training must include hazards and controls for exposure to site contaminants and chemicals used on-site. MSDSs on-site. All chemical containers labeled to indicate contents and hazard. 	None
Biological hazards (bees, ticks, Lyme disease, histoplasmosis, wasps, snakes, West Nile Virus)	PPE (boots, work clothes). Insect repellant on boots, pants, and elsewhere, as necessary, to repel ticks and mosquitoes. Pant legs tucked into boots or otherwise closed to minimize tick entry. Inspect for ticks during the day and at the end of each workday (see Section 9.0 of FSHP). Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FSHP).	Visual survey

Table 3-3. Hazards Analysis

Safety and Health Hazards	Controls	Monitoring Requirements
Vehicle accidents	Compliance with E2I EH&S Procedure 110 "Vehicle Operation" to include	Verification of valid drivers
	verification of current drivers licenses, use of seat belts when vehicle is in motion,	licenses by FM
	daily (undocumented) vehicle safety inspection, compliance with applicable laws	
	and regulations, and defensive driving.	
Temperature extremes	Administrative controls (see Section 8.0 of FSHP). Cooled (shaded) or warmed	Temperature measurements at
	break area depending on the season. Routine breaks in established break area (see	least twice daily. Pulse rates at
	Section 8.0 of FSHP). Chilled drinks if temperature exceeds 70°F and warm drinks if	the start of each break if
	temperature is below 50°F	wearing impermeable clothing
Severe weather	Locate nearest severe weather shelter/strong structure before beginning fieldwork.	Visual observation for lightning,
	Suspend fieldwork if lighting within 10 miles of site or tornado warning issued. Do	strong winds, or heavy rain.
	not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in	Check forecast prior to starting
	immediate area or upstream of site.	work daily.
Drowning	When possible, the water in the ditch will be released or pumped to a Frac Tank when	The water depth in the ditch will
	accumulation poses a potential drowning hazard. Personal flotation device will be worn	be monitored.
	when working within 6 feet of water deeper than 3 feet.	
	Dry Sediment Sampling Using Hand Augers or Scoops	
General safety hazards (manual	Level D PPE: long pants, shirts with sleeves, safety boots, safety glasses, and work	Daily site safety inspections
lifting, slips, falls)	gloves for manual work (see Section 5.0 of FSHP). Buddy system. Site-specific	
	training. Proper housekeeping.	
Excavation Entry	Contractor will have an excavation competent person on-site per OSHA Excavation	Daily safety inspections and
	Standard 29 CFR 1926 subpart P. The excavation competent person will observe all	visual surveys
	site tasks during daily safety inspections and will use professional judgment and	
	appropriate monitoring results to determine if excavation work is safe. The	
	excavation competent person shall not at any time enter the excavation. Contractor	
	personnel who enter the excavation shall follow OSHA Excavation Standard 29	
	CFR 1926 subpart P.	

Safety and Health Hazards	Controls	Monitoring Requirements
Contact with OE	On-site training in ordnance recognition for all field personnel. Clearance of sites by	Visual and instrument surveys
	OE personnel for intrusive work. Continuous escort by OE personnel when in areas	by OE technicians following
	with potential to encounter OE. Withdrawal of all non-OE personnel if ordnance or	requirements of, Safety and
	suspected ordnance is discovered. Sampling of stations having known or suspected	Health Requirements for
	(i.e., red soil or raw product) explosives >10% (100,000 mg/kg) to be performed by	Munitions and Explosives of
	OE technicians following applicable OE safety requirements.	Concern (MEC) ER-385-1-95
Exposure to chemicals	Level D PPE plus nitrile or equivalent gloves for contact with contaminated	Visual observations for dust
	material. Wash face and hands prior to taking anything by mouth. Stay upwind of	during dry sediment sampling
	any dust-generating activities. Dust suppression techniques (such as wetting area) as	activities
	required. Hazardous waste site operations training and medical clearance. Site	
	training must include hazards and controls for site contaminants and all chemicals	
	used on-site. MSDSs for chemical tools on-site. Chemical containers labeled to	
	indicate contents and hazard.	
Temperature extremes	Administrative controls (see Section 8.0 of FSHP). Cooled (shaded) or warmed	Temperature measurements at
	break area depending on the season. Routine breaks in established break area (see	least twice daily. Pulse rates at
	Section 8.0 of FSHP). Chilled drinks if temperature exceeds 70°F and warm drinks	the start of each break if
	if temperature is below 50° F.	wearing impermeable clothing
Severe weather	Locate nearest severe weather shelter/strong structure before beginning fieldwork.	Visual observation for lightning,
	Suspend fieldwork if lighting within 10 miles of site or tornado warning issued. Do	strong winds, or heavy rain.
	not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in	Check forecast prior to starting
	immediate area or upstream of site.	work daily
Vehicle accidents	Compliance with E2I EH&S Procedure 110 "Vehicle Operation" to include	Verification of valid drivers
	verification of current drivers licenses, use of seat belts when vehicle is in motion,	licenses by FM
	daily (undocumented) vehicle safety inspection, compliance with applicable laws	
	and regulations, and defensive driving.	
Lifting injuries	Compliance with E2I EH&S Procedure 150 "Manual Lifting" to limiting individual	Verification/observation of
	lifts by SAIC personnel to 50 pounds	lifting by SAIC personnel by
		FM

Safety and Health Hazards	Controls	Monitoring Requirements
Biological hazards (bees, ticks,	PPE (boots, work clothes). Insect repellant on boots, pants, and elsewhere, as	Visual survey
Lyme disease, histoplasmosis,	necessary, to repel ticks and mosquitoes. Pant legs tucked into boots or otherwise	
wasps, snakes, West Nile Virus)	closed to minimize tick entry. Snake chaps if working in overgrown areas. Inspect	
	for ticks during the day and at the end of each workday (see Section 9.0 of FSHP).	
	Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FSHP).	
Drowning	When possible, the water in the ditch will be released or pumped to a Frac Tank when	The water depth in the ditch will
	accumulation poses a potential drowning hazard. Personal flotation device will be worn	be monitored.
	when working within 6 feet of water deeper than 3 feet.	
T	Vegetation Clearing with Chainsaws, Machetes, Sling Blades and Heavy Equipment	
General safety hazards (contact with	Level D PPE: long pants, shirts with sleeves, safety boots, safety glasses, plus	Daily site safety inspections
sharp edges, slips, falls)	heavy-duty work gloves and hard hat (see Section 5.0 of FSHP). Buddy system.	
	Site-specific training. Proper housekeeping. Only experienced operators. Personnel	
	operating brush-clearing tools must maintain separation of at least 15 ft. Machetes	
	equipped with lanyard and lanyard looped around wrist. Tools must be inspected	
	daily and taken out of service if damaged. Exclusion zone if there is a potential for	
	entry of unauthorized personnel.	
Excavation Entry	Contractor will have an excavation competent person on-site per OSHA Excavation	Daily safety inspections and
	Standard 29 CFR 1926 subpart P. The excavation competent person will observe all	visual surveys
	site tasks during daily safety inspections and will use professional judgment and	
	appropriate monitoring results to determine if excavation work is safe. The	
	excavation competent person shall not at any time enter the excavation. Contractor	
	personnel who enter the excavation shall follow OSHA Excavation Standard 29	
	CFR 1926 subpart P.	
Chainsaw kickback and related	Chainsaw chaps and face shield as additional PPE. Saws must have automatic chain	Daily inspection
hazards	brake or kickback device. Idle speed adjusted so chain does not move when idling.	
	Only experienced operators may use chainsaw. Saws must not be used to cut above	
	shoulder height. Saws must be held with both hands when operating. Additional	
	requirements at 385-1-1 Section 31.	
Noise (chainsaw)	Hearing protection \geq NRR 25 within 7.6 m (25 ft) of operating chainsaw or heavy	Daily safety inspections
	equipment unless specific monitoring indicates noise exposure of less than 85 dBA	

Safety and Health Hazards	Controls	Monitoring Requirements
Fire (fuels)	Fuels stored in safety cans with flame arrestors. Bonding (metal to metal) and grounding during fuel transfers. Fuel storage areas marked with no smoking or open flames signs. Fire extinguishers in all fuel use areas. Gasoline-powered equipment turned off and allowed to cool for at least 5 min prior to fueling.	Daily safety inspection
Contact with OE	On-site training in ordnance recognition for all field personnel. Clearance of sites by OE personnel for intrusive work. Escort by OE personnel when in areas with potential to encounter OE. Withdrawal of all non-OE personnel if ordnance or suspected ordnance is discovered.	Visual and instrument surveys by OE technicians following requirements of <i>Safety and</i> <i>Health Requirements for</i> <i>Munitions and Explosives of</i> <i>Concern (MEC), ER-385-1-95</i>
Exposure to chemicals	Level D PPE plus nitrile or equivalent gloves for contact with contaminated material. Wash face and hands prior to taking anything by mouth. Hazardous waste site operations training and medical clearance. Site training must include the hazards and appropriate controls for site contaminants and chemicals to be used or stored on- site. Chemical containers labeled to indicate contents and hazard. Medical clearance for hazardous waste work.	Visual observations for dust during vegetation clearing activities and daily safety inspection.
Temperature extremes	Administrative controls (see Section 8.0 of FSHP). Cooled (shaded) or warmed break area depending on the season. Routine breaks in established break area (see Section 8.0 of FSHP). Chilled drinks if temperature exceeds 70°F and warm drinks if temperature is below 50°F.	Temperature measurements at least twice per day. Pulse rates at the start of each break if wearing impermeable clothing
Severe weather	Locate nearest severe weather shelter/strong structure before beginning fieldwork. Suspend fieldwork if lighting within 10 miles of site or tornado warning issued. Do not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in immediate area or upstream of site.	Visual observation for lightning, strong winds, or heavy rain. Check forecast prior to starting work daily
Vehicle accidents	Compliance with E2I EH&S Procedure 110 "Vehicle Operation" to include verification of current drivers licenses, use of seat belts when vehicle is in motion, daily (undocumented) vehicle safety inspection, compliance with applicable laws and regulations, and defensive driving.	Verification of valid drivers licenses by FM
Lifting injuries	Compliance with E2I EH&S Procedure 150 "Manual Lifting" to limiting individual lifts by SAIC personnel to 50 pounds.	Verification/observation of lifting by SAIC personnel by FM.

Safety and Health Hazards	Controls	Monitoring Requirements
Biological hazards (bees, ticks,	PPE (boots, work clothes). Insect repellant on boots, pants, and elsewhere, as necessary,	Visual survey
Lyme disease, histoplasmosis,	to repel ticks and mosquitoes. Pant legs tucked into boots or otherwise closed to	
wasps, snakes, West Nile Virus)	minimize potential for tick entry. Snake chaps if working in overgrown areas. Inspect	
	for ticks during the day and at the end of each workday (see Section 9.0 of FSHP).	
	Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FSHP).	
	Investigation-Derived Waste Handling	
General hazards (lifting equipment,	Level D PPE: long pants, shirts with sleeves, safety glasses, safety shoes or boots,	Daily safety inspections of
manual lifting, slips)	heavy-duty gloves for materials handling, and hard hat if overhead hazards are present	operations. Daily inspection of
	(see Section 5.0 of FSHP). Buddy system. Site-specific training. Proper housekeeping.	equipment to verify brakes and
	Unnecessary personnel will stay well clear of operating equipment. Functional back-up	operating systems are in proper
	alarm on fork trucks, Bobcats, trucks. Ravenna O&M contractor personnel will provide	working condition
	any required fork truck services in the IDW staging area (Building 1036). IDW	
	movement from field sites to Building 1036 will be conducted by the drilling	
	subcontractor using a backhoe equipped with forks and drum dollys. No personnel	
	allowed under lifted loads. Lifts of greater than 50 lbs will be made with two or more	
	personnel or with lifting equipment. Hazardous waste safety training. Compliance with	
	EM 385-1-1 Sections 14 and 16.	
Excavation Entry	Contractor will have an excavation competent person on-site per OSHA Excavation	Daily safety inspections and
	Standard 29 CFR 1926 subpart P. The excavation competent person will observe all	visual surveys
	site tasks during daily safety inspections and will use professional judgment and	
	appropriate monitoring results to determine if excavation work is safe. The	
	excavation competent person shall not at any time enter the excavation. Contractor	
	personnel who enter the excavation shall follow OSHA Excavation Standard 29	
	CFR 1926 subpart P.	
Contact with OE	On-site training in ordnance recognition for all field personnel. Clearance of sites by	Visual and instrument surveys
	OE personnel for intrusive work. Continuous escort by OE personnel if working in	by OE technicians following
	areas with potential for OE. Withdrawal of all non-OE personnel if ordnance or	requirements of Safety and
	suspected ordnance is discovered.	Health Requirements for
		Munitions and Explosives of
		Concern (MEC), ER-385-1-95

Safety and Health Hazards	Controls	Monitoring Requirements
Exposure to chemicals	Level D PPE plus nitrile or equivalent gloves for contact with contaminated	Daily safety inspections
	material. Wash face and hands prior to taking anything by mouth. Hazardous waste	
	site operations training and medical clearance. Site training must include hazards	
	and controls for exposure to site contaminants and chemicals used on-site.	
Vehicle accidents	Compliance with E2I EH&S Procedure 110 "Vehicle Operation" to include	Verification of valid drivers
	verification of current drivers licenses, use of seat belts when vehicle is in motion,	licenses by FM
	daily (undocumented) vehicle safety inspection, compliance with applicable laws	
	and regulations, and defensive driving.	
Lifting injuries	Compliance with E2I EH&S Procedure 150 "Manual Lifting" to limiting individual	Verification/observation of
	lifts by SAIC personnel to 50 pounds.	lifting by SAIC personnel by
		FM
Fire (vehicle fuels and flammable	Fuels stored in safety cans with flame arrestors. Bonding (metal to metal) and	Daily safety inspection
contaminants)	grounding during fuel transfers. Fuel storage areas marked with no smoking or open	
	flames signs. Gasoline-powered equipment will be shut down and allowed to cool	
	for 5 min before fueling. Fire extinguishers in all fuel use areas.	
Noise	Hearing protection within 7.6 m (25 ft) of any noisy drum moving equipment unless	Daily safety inspections
	equipment-specific monitoring indicates exposures less than 85 dBA.	
Biological hazards (bees, ticks,	PPE (boots, work clothes). Insect repellant on pants, boots, and elsewhere, as	Visual survey
Lyme disease, histoplasmosis,	necessary, to repel ticks and mosquitoes. Pant legs tucked into boots or otherwise	
wasps, snakes, West Nile Virus)	closed to minimize tick entry. Snake chaps if working in overgrown areas. Inspect	
	for ticks during the day and at the end of each workday (see Section 9.0 of FSHP).	
	Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FSHP).	
Electric shock	Identification and clearance of overhead utilities. GFCI for all electrical hand tools.	Visual survey of all work areas
Temperature extremes	Administrative controls (see Section 8.0 of FSHP). Cooled (shaded) or warmed	Temperature measurements at
	break area depending on the season. Routine breaks in established break area (see	least twice daily. Pulse rates at
	Section 8.0 of FSHP). Chilled drinks if temperature exceeds 70°F and warm drinks	the start of each break if
	if temperature is below 50° F.	wearing impermeable clothing

Safety and Health Hazards	Controls	Monitoring Requirements
Severe weather	Locate nearest severe weather shelter/strong structure before beginning fieldwork.	Visual observation for lightning,
	Suspend fieldwork if lighting within 10 miles of site or tornado warning issued. Do	strong winds, or heavy rain.
	not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in	Check forecast prior to starting
	immediate area or upstream of site.	work daily
	Equipment Decontamination (Water Washing)	
General equipment decontamination	Level D PPE plus nitrile or PVC gloves (see Section 5.0 of FSHP). Face shield and	Daily safety inspections
hazards (water, slips, falls,	Saranax or rain suit when operating steam washer. Site-specific training. Proper	
equipment handling)	housekeeping.	
Noise (spray washer)	Hearing protection when washer is operating unless equipment-specific monitoring	None
	indicates that exposure is less than 85 dBA.	
Exposure to chemicals	Level D PPE plus nitrile or equivalent gloves for contact with contaminated material.	None
	Wash face and hands prior to taking anything by mouth. Minimal contact. Hazardous	
	waste site operations training and medical clearance. Site training must include	
	hazards and controls for exposure to site contaminants and chemicals used on-site.	
	MSDSs on-site. All chemical containers labeled to indicate contents and hazard.	
Electric shock	Portable electrical hand tools and equipment must be connected through functional	Verification by FM
	GFCIs.	
Vehicle accidents	Compliance with E2I EH&S Procedure 110 "Vehicle Operation" to include	Verification of valid drivers
	verification of current drivers licenses, use of seat belts when vehicle is in motion,	licenses by FM
	daily (undocumented) vehicle safety inspection, compliance with applicable laws	
	and regulations, and defensive driving.	
Lifting injuries	Compliance with E2I EH&S Procedure 150 "Manual Lifting" to limiting individual	Verification/observation of
	lifts by SAIC personnel to 50 pounds.	lifting by SAIC personnel by
		FM
Temperature extremes	Administrative controls (see Section 8.0 of FSHP). Cooled (shaded) or warmed	Temperature measurements at
	break area depending on the season. Routine breaks in established break area (see	least twice a day. Pulse rates at
	Section 8.0 of FSHP). Chilled drinks if temperature exceeds 70 ⁰ F and warm drinks if	the start of each break if
	temperature is below 50° F.	wearing impermeable clothing

Safety and Health Hazards	Controls	Monitoring Requirements
Severe weather	Locate nearest severe weather shelter/strong structure before beginning fieldwork.	Visual observation for lightning,
	Suspend fieldwork if lighting within 10 miles of site or tornado warning issued. Do	strong winds, or heavy rain.
	not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in	Check forecast prior to starting
	immediate area or upstream of site.	work daily

Safety and Health Hazards	Controls	Monitoring Requirements
Site	Preparation, Excavation, Truck Loading, and Site Restoration using Heavy Equipmen	ut
General Safety hazards associated	Excavation subcontractor must have and operate their own safety programs,	Daily safety inspections of
with excavation equipment	procedures, and practices. Excavation subcontractor will develop and implement	operations.
	procedures pertaining to excavation safety and subsurface asset and hazard	Initial and at least weekly
	avoidance. SAIC will review these procedures and ensure they are at least as	inspections of excavation
	protective as SAIC's E2I EH&S Procedure 130 "Subsurface Asset and Hazard	equipment
	Avoidance" and Procedure 160 "Excavation Safety". Compliance with E2I EH&S	
	Procedure 130 "Subsurface Asset and Hazard Avoidance" will be conducted prior to	
	excavation activities to prevent contact with buried utilities and or OE. Compliance	
	with E2I EH&S Procedure 160 "Excavation Safety" will include a subcontractor	
	excavation competent person, documented review of Procedure 160 by SAIC FM,	
	daily inspection of excavation, no entry in trenches deeper than 4 feet without	
	additional controls.	
	Unnecessary personnel will stay well clear of operating equipment. Functional	
	back-up alarm. Exclusion zone around excavation areas. Only experienced	
	operators will be allowed to operate equipment. Hazardous waste safety training.	
	Level D PPE including hardhat (see Section 5.0).	
Excavation Entry	Contractor will have an excavation competent person on site per OSHA Excavation	Daily safety inspections and
	Standard 29 CFR 1926 subpart P. The excavation competent person will observe all	visual surveys.
	site tasks during daily safety inspections and will use professional judgment and	
	appropriate monitoring results to determine if excavation work is safe. The	
	excavation competent person shall not at any time enter the excavation.	
	Subcontractor personnel who enter the excavation shall follow OSHA Excavation	
	Standard 29 CFR 1926 subpart P.	
Contact with OE	Pre-entry screening survey and continuous escort by OE specialist support following	Visual surveys for ordnance
	requirements of Safety and Health Requirements for Munitions and Explosives of	conducted by OE expert
	Concern (MEC), ER-385-1-95. On-site training in ordnance recognition for all field	personnel
	personnel. Withdrawal of all SAIC and subcontractor personnel from immediate	
	area and field marking of suspect area if ordnance or suspected ordnance is	
	discovered	

Safety and Health Hazards	Controls	Monitoring Requirements
Fire (vehicle fuels and flammable	Fuels stored in safety cans with flame arrestors. Bonding and grounding during fuel	Daily safety inspection.
contaminants)	transfers. Fuel storage areas marked with no smoking or open flames signs. Fire	Combustible gas indicator if
	extinguishers in all fuel use areas.	buried organic material or other
		source of flammable gas
		suspected
Noise	Hearing protection within 7.6 meters (25 feet) of backhoe or similar equipment	Daily safety inspections
	unless equipment-specific monitoring indicates exposures less than 90 decibels.	
Exposure to chemicals	PPE (Level D) plus nitrile or equivalent gloves for contact with contaminated	Visual observations for dust
	material. Washing face and hands prior to taking anything by mouth. Dust	during dry sediment removal
	suppression techniques (such as wetting area) as required. Staying upwind of any	activities
	dust-generating activities. Work stoppage or increased PPE during periods of high-	
	winds. Minimal contact. Hazard communication training. MSDS for chemical	
	tools on site. Chemical containers labeled to indicate contents and hazard.	
	Medical clearance for hazardous waste work. Decontamination of potentially	
	contaminated equipment prior to servicing.	
Biological hazards (bees, ticks,	PPE (boots, work clothes). Insect repellant, as necessary. Pant legs tucked into	Visual survey
Lyme disease, histoplasmosis,	boots or otherwise closed to minimize tick entry. Inspect for ticks during the day	
wasps, snakes)	and at the end of each work day (See Section 9.0). Avoidance of accumulations of	
	bird or bat droppings (See Section 9.0).	
Electric shock	Identification and clearance of overhead and underground utilities per E2I EH&S	Visual of all work areas.
	Procedure 130.	
Temperature extremes	Administrative controls (see Section 8.0).	Temperature measurements at
	Cooled (shaded) or warmed break area depending on the season.	least twice daily. Pulse rates at
	Routine breaks in established break area (See Section 8.0).	the start of each break if
	Chilled drinks if temperature exceeds 70 ⁰ F and warm drinks if temperature is below	wearing impermeable clothing.
	50 ⁰ F.	
Severe weather	Locate nearest severe weather shelter/strong structure before beginning fieldwork.	Visual observation for lightning,
	Suspend fieldwork if lighting within 10 miles of site or tornado warning issued. Do	strong winds, or heavy rain.
	not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in	Check forecast prior to starting
	immediate area or upstream of site.	work daily.

Safety and Health Hazards	Controls	Monitoring Requirements
Drowning	When possible, the water in the ditch will be released or pumped to a Frac Tank when	The water depth in the ditch will
	accumulation poses a potential drowning hazard. Personal flotation device will be worn	be monitored.
	when working within 6 feet of water deeper than 3 feet.	
E2I = Energy, Environment, & Infrastruct	ure Business Unit MSDS = Material Safety Data Sheet PVC = polyvinyl chloride	

$E_{21} = Energy, Environment, & Initastructure Business Unit$	MSDS = Material Safety Data Sheet	PVC = polyvinyl chloride
EH&S = Environmental, Health and Safety	NRR= Noise Reduction Rating	RVAAP = Ravenna Army Ammunition Plant
FM = Field Manager	OE = ordinance and explosives	SAIC = Science Applications International Corporation
FSHP = Facility Wide Safety and Health Plan	O&M = operations and maintenance	UXO = unexploded ordnance
GFCI = ground-fault circuit interrupter	PID= photoionization detector	
IDW = investigation-derived waste	PPE = personal protective equipment	

STAFF ORGANIZATION, QUALIFICATIONS, AND **4.0** 1

2 **RESPONSIBILITIES**

3

4 This Section presents the personnel (and their associated telephone numbers) responsible for site 5 safety and health and emergency response. Table 4-1 identifies the SAIC and subcontractor staff who will fill key roles. See the FSHP for information on the roles and responsibilities of key positions.

6

7 8

Position	Name	Phone
SAIC Health and Safety Manager	Steve Davis CIH, CSP	(865)481-4755
SAIC Project Manager	Kevin Jago	(865)481-4614
SAIC Construction Manager	Jed Thomas	(330)405-5802
Subcontractor Construction Supervisor	TBD	
Subcontractor Site Safety and Health Officer ¹	TBD	
MEC Avoidance Subcontractor	TBD	

Table 4-1. Staff Organization

9 ¹ Subcontractor Site Safety and Health Officer will be SSHO for all remedial activities.

10 CIH= Certified Industrial Hygienist

11 CSP = Certified Safety Professional

12 MEC = munitions and explosives of concern THIS PAGE INTENTIONALLY LEFT BLANK.

1 **5.0 TRAINING**

Training requirements, from Section 4.0 of the FSHP, are summarized in Table 5-1 and in Table 3-2.

5

2

Table 5-1. Training Requirements

			Site Visitor
Training	Worker	Supervisor	(exclusion zone)
HAZWOPER (40-hr, 3-day OJT)			
HAZWOPER Annual Refresher (8 hr)			
HAZWOPER Supervisors Training (8 hr)			
CPR and First Aid Training			
General Hazard Communication Training			
Respiratory Protection Training			
(required only if respirators are worn)			
Hearing Conservation Training (for workers in hearing	\checkmark		
conservation program)			
Pre-entry Briefing			
Site-Specific Hazard Communication (contained in pre-entry			
briefing)			
Safety Briefing (daily and whenever conditions or tasks			
change)			
Equipment-Specific Training (Equipment Operators)			
OSHA Excavation Competent Person Training			

6 $\sqrt{1}$ = required.

- 7 HAZWOPER = Hazardous Waste Site Operations and Emergency Response.
- 8 OJT = on-the-job training.
- 9 OSHA = Occupational Safety and Health Administration
- 10 CPR = Cardio Pulmonary Resuscitation

1 6.0 PERSONAL PROTECTIVE EQUIPMENT

2 3

General guidelines for selection and use of PPE are presented in the FSHP. Specific PPE

4 requirements for this work are presented in the hazard/risk analysis section (Section 3.0).

1 7.0 MEDICAL SURVEILLANCE

2

3 Medical surveillance requirements, as presented in Section 6.0 of the FSHP, are summarized in Table

- 4 7-1.
- 5

6

Table 7-1. Medical Surveillance Requirements

Baseline	Routine	Overexposure	Termination
Prior to work	Every 12 months, unless greater	Upon developing symptoms	Upon termination or re-
assessment	frequency is deemed appropriate	or where exposure limits have	assignment
	by attending physician. Not to	been exceeded or suspected to	
	exceed 2-year interval	have been exceeded	

7

- 8 All medical exams shall include (see Section 6.2 of the Facility Wide Safety and Health Plan):
- 9
- 10 Medical/work history;
- 11 Physical exam by physician;
- Audiometry;
- 13 Blood screening and blood count;
- Chest x-ray, as specified by physician;
- Electrocardiogram, as specified by physician;
- Spirometry; and

• Urinalysis.

1 8.0 EXPOSURE MONITORING/AIR SAMPLING PROGRAM

2

3 Assessment of airborne chemical concentrations will be performed, as appropriate, to ensure that exposures do not exceed acceptable levels. Action levels, with appropriate responses, have been 4 5 established for this monitoring. In addition to the specified monitoring, the SSHO may perform or 6 require additional monitoring, such as organic vapor monitoring in the equipment decontamination 7 area or personnel exposure monitoring for specific chemicals. The deployment of monitoring 8 equipment will depend on the activities being conducted and the potential exposures. All personal 9 exposure monitoring records will be maintained in accordance with 29 Code of Federal Regulations 10 1910.20. The minimum monitoring requirements and action levels are presented in Table 8-1.

11

Most of the field activities are not expected to pose airborne exposure hazards for the followingreasons:

- 14
- With the exception of sampling equipment decontamination, which will be performed in a well-ventilated building, work will be performed in open areas with natural ventilation; and
- The most probable contaminants (metals) are materials with relatively low vapor pressures
 and exposure can be controlled through dust suppression techniques.
- 19 The SSHO will examine site conditions and will contact the Health and Safety Manager to initiate 20 monitoring if there is any indication of potential airborne exposure.

Hazard or Measured					
Parameter	Area	Interval	Limit	Action	Tasks
Visible airborne dust potentially containing SRCs	All	Continuously	Visible dust generation	Stop work; use dust suppression techniques such as wetting surface	All
Airborne organics with PID or equivalent	Breathing zone 0.9 m [3 ft] from source or 0.36 m [14 in.] in front of employee's shoulder	From 1 to 3 ft below ground surface and if site conditions, such as discolored soil or chemical smells, indicate that monitoring is necessary	<5 ppm >5 ppm	Level D Withdraw and evaluate • evaluate need for PPE upgrade • identify contaminants • notify project manager and H&S manager	Excavation with heavy equipment, hand auguring, power augering, and other intrusive work
Noise	All areas perceived as noisy	Any area where there is some doubt about noise levels	85 dBA TWA and	Require the use of hearing protection	Hearing protection will be worn within the exclusion zone, around power augers, or other motorized equipment

Table 8-1.	Monitoring R	equirements an	d Action	Limits
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H&S = health and safety

PID = photoionization detector

PPE = personal protective equipment

ppm = parts per million

1 9.0 HEAT/COLD STRESS MONITORING

2 3

General requirements for heat/cold stress monitoring are contained in Section 8 of the FSHP.

1 **10.0 STANDARD OPERATING SAFETY PROCEDURES**

2

3 Standard operating safety procedures are described in the FSHP. Dust generation activities may occur during material excavation, handling, and transportation. Prior to the start of any ground/soil or 4 dry sediment disturbance activities (e.g., clearing and grubbing, excavating, grading), the area will be 5 6 misted with water to prevent the generation of dust. The SSHO will monitor all ground disturbance 7 activities to ensure dust is not being generated. In the event that any dust becomes visible, the 8 activity will cease and the area will be misted with water. During instances of high winds resulting in 9 excessive dust, and dust control measures do not prevent the generation of dust, work stoppage and/or 10 additional PPE may be required.

11

In addition, all access roads, and all other work areas within the project boundaries will be maintained free from soil that could cause a hazard or nuisance. Dust control will be maintained by keeping

14 traffic on improved roads, maintaining the posted speed limit, and applying water as required. The

15 Subcontractor will employ water spraying/misting for dust control if airborne dust is observed.

16 Water used for dust control will be clean (i.e., obtained from RVAAP sources with approval of the

17 RVAAP Facility Manager, or potable water obtained from an off-site source). The use of additives

18 will not be permitted.

1 **11.0 SITE CONTROL MEASURES**

2 3

Site control measures are described in Section 10 of the FSHP. No formal site control is expected to

- 4 be necessary for this work, as the work area is somewhat remote and bystanders are not anticipated.
- 5 The RVAAP installation is not open to the public, and only authorized personnel are allowed in
- 6 LL12. However, an exclusion zone will be established around the excavation as described in Sections
- 7 9.7 and 10.1 of the FSHP. If the SSHO determines that a potential exists for unauthorized personnel
- 8 to approach within 25 ft of a work zone or otherwise be at risk due to proximity, then additional site
- 9 controls will be established as described in the FSHP.

1 12.0 PERSONNEL HYGIENE AND DECONTAMINATION

2 3

Personal hygiene and decontamination requirements are described Section 11.0 of the FSHP.

1 13.0 EMERGENCY PROCEDURES AND EQUIPMENT

2

Emergency contacts, telephone numbers, directions to the nearest medical facility, and general 3 4 procedures can be found in the FSHP. Table 13-1 presents the emergency phone numbers available 5 for normal working hours (Monday through Friday, 8:00 am to 4:00 pm). All emergencies on-site 6 will be coordinated first through Guard Post 1 [(330) 358-2017] who will coordinate the response. 7 The SAIC field operations manager will remain in charge of all SAIC and subcontractor personnel 8 during emergency activities. The SAIC field office will serve as the assembly point if it becomes 9 necessary to evacuate the remedial location. During mobilization, the SSHO will verify that the 10 emergency information in the FSHP is correct.

11

Each field team shall have a cellular phone and/or a 2-way radio capable of contacting Guard Post 1for communications purposes.

- 14
- 14

15 During field operations all on-site personnel shall have CPR/first aid training.

- 16
- 17

Table 13-1. Emergency Phone Numbers

Position	Phone
RVAAP Guard Post 1	
(Police, Fire, Emergency Medical)	(330)358-2017
Camp Ravenna Operations/Range Control	(614) 336-6793 or
	(614) 336-6562
Hospital (Robinson Memorial, Ravenna)	(330) 297-2449/0811
RVAAP Facility Manager	
Mark Patterson	Office: (330) 358-7311
RVAAP Operation and Maintenance Contractor	
Jim McGee, Vista Sciences	Office: (330) 358-3005
USACE	
Tom Chanda	Office: (502) 315-6868
Ohio EPA, Todd Fisher	Office: (330) 963-1148
SAIC Project Manager,	
Kevin Jago	Office: (865) 481-4614
Jed Thomas	Office: (330) 405-5802 Cell: (216) 214-2599
SAIC Health and Safety Personnel,	
Steve Davis CIH, CSP	(865) 481-4755
Heather Miller	Office: (330) 405-5814 Cell: 330-573-8571

- 18 RVAAP = Ravenna Army Ammunition Plant
- 19 USACE = U.S. Army Corps of Engineers
- 20 Ohio EPA = Ohio Environmental Protection Agency
- 21 SAIC = Science Applications International Corporation, Inc.
- 22 CIH= Certified Industrial Hygienist
- 23 CSP = Certified Safety Professional

1 14.0 LOGS, REPORTS, AND RECORD KEEPING

2 3

Logs, reports, and record keeping requirements are described in Section 13 the FSHP.

2

- ACGIH (American Conference of Governmental Industrial Hygienists) 2008. Threshold Limit Values. 2008.
- NIOSH (National Institute for Occupational Safety and Health) 2005. *NIOSH Pocket Guide to Chemical Hazards*. September 2005.
- USACE (U.S. Army Corps of Engineers). Safety and Health Requirements for Munitions and Explosives of Concern (MEC), ER-385-1-95. March 2007.
- USACE Safety and Occupational Health Requirements for Hazardous, Toxic, and Radioactive Waste (HTRW), ER-385-1-92. May 2007.
- USACE Safety and Health Requirements Manual, EM-385-1-1. November 2008.
- USACE 1998. Phase I Remedial Investigation Report for High-Priority Areas of Concern at the Ravenna Army Ammunition Plant, Ravenna, Ohio, DACA62-94-D-0029, DO Nos. 0010 and 0022, Final. February 1998.
- USACE 2001. Facility Wide Safety and Health Plan for Environmental Investigations at the Ravenna Army Ammunition Plant, Ravenna, Ohio, DACA62-00-D-0001, D.O. CY02. March 2001.
- USACE 2004. Phase II Remedial Investigation Report for Load Line 12 (RVAAP-12) at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2004.
- USACE 2006. Final Feasibility Study (FS) for Load Line 12 (RVAAP-12) at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2006.

16.0 FACILITY AND HOSPITAL MAPS

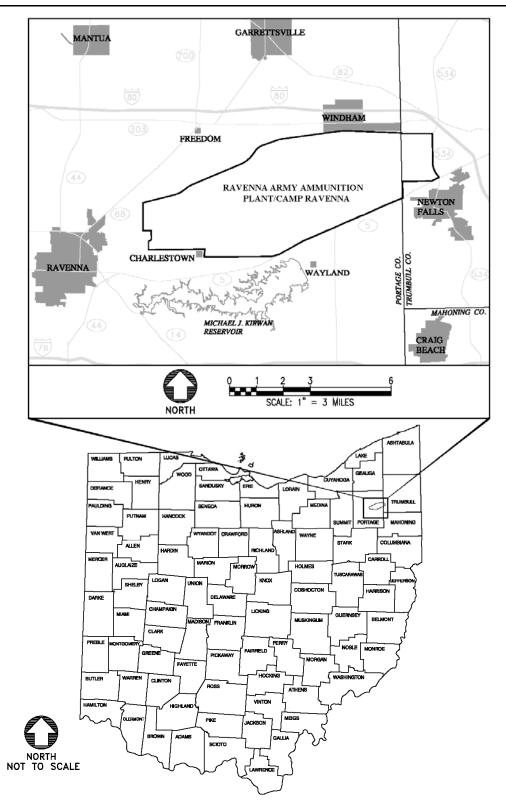
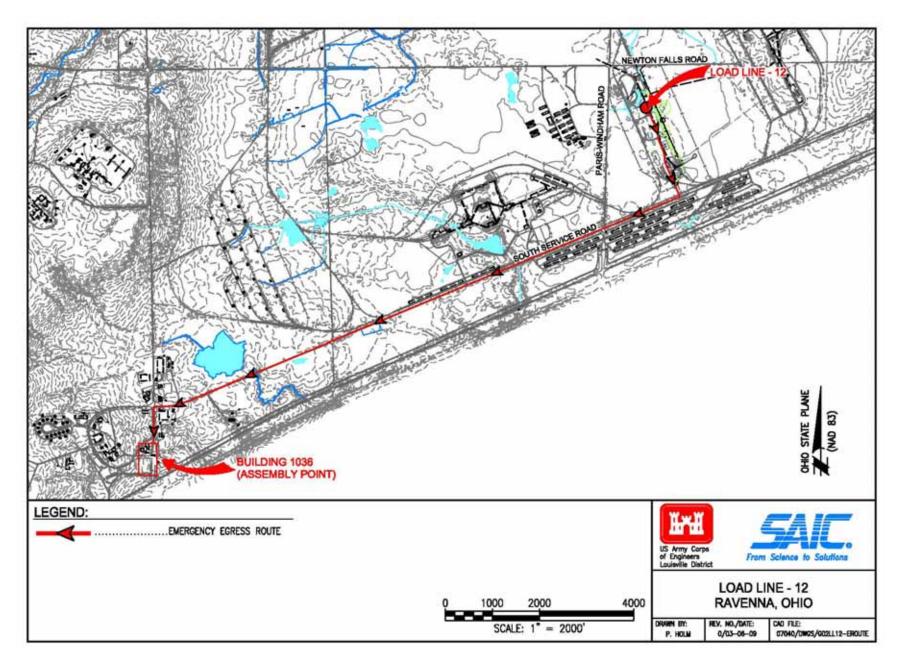
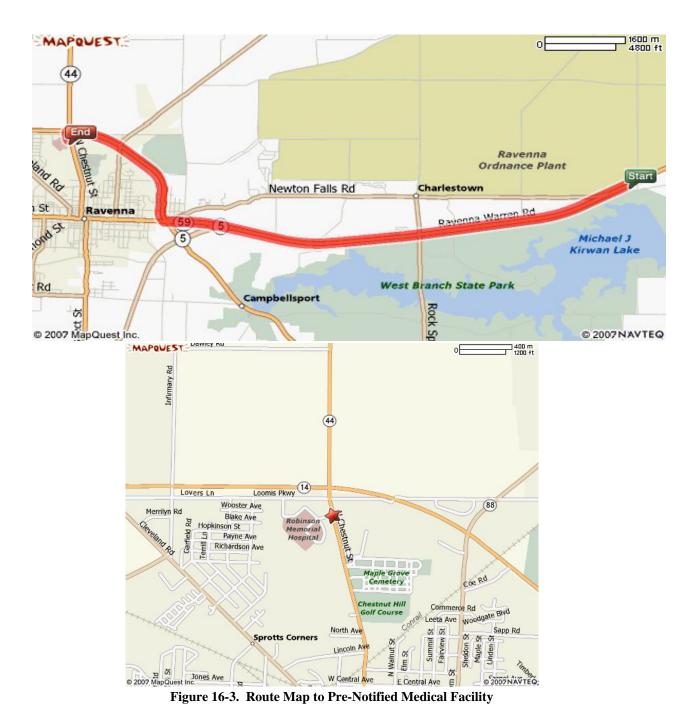


Figure 16-1. General Location and Orientation of RVAAP/Camp Ravenna







Robinson Memorial Hospital 6847 N. Chestnut Street Ravenna, Ohio (330) 297-0811 or (330) 297-2448

Directions: West (right) on State Route 5. Keep to right at Y-intersection onto OH-59 West. Turn Right onto OH-14/OH-44 at intersection. Turn Left onto North Chestnut St, just past GE plant. Hospital on right.

Attachment **B**

Storm Water Pollution Prevention Plan for the Draft Remedial Design for the RVAAP-12 Load Line 12

Ravenna Army Ammunition Plant Ravenna, Ohio

GSA Contract No. GS-10F-0076J Delivery Order No. W912QR-05-F-0033

Prepared for: U.S. Army Corps of Engineers 600 Martin Luther King, Jr. Place Louisville, Kentucky 40202

Prepared by:

SAIC Engineering of Ohio, Inc. 8866 Commons Boulevard Twinsburg, Ohio 44087

July 13, 2009

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Appendix A. Permit to Authorize Storm Water Discharges Associated with Construction Activities

ACRONYMS AND ABBREVIATIONS

AASHTO	American Association of Highway and Transportation Officials
amsl	Above Mean Sea Level
AOC	Area of Concern
BMP	Best Management Practices
Camp Ravenna	Camp Ravenna Joint Military Training Center
COC	Constituent of Concern
COR	Contract Officer Representative
CQAP	Construction Quality Assurance Plan
DFFO	Director's Final Findings and Orders
GSA	General Services Administration
IDW	Investigation-Derived Waste
IRP	Installation Restoration Program
LL12	Load Line 12
MEC	Munitions and Explosives of Concern
MI	Multi-Increment
NOI	Notice of Intent
NOT	Notice of Termination
ODNR	Ohio Department of Natural Resources
OHARNG	Ohio Army National Guard
Ohio EPA	Ohio Environmental Protection Agency
ORC	Ohio Revised Code
RD	Remedial Design
RVAAP	Ravenna Army Ammunition Plant
SAIC	Science Applications International Corporation
SWP3	Storm Water Pollution Prevention Plan
USACE	U.S. Army Corps of Engineers

1 1.0 INTRODUCTION

2

3 Science Applications International Corporation (SAIC) has been contracted by the U.S. Army Corps 4 of Engineers (USACE), Louisville District, to provide environmental services in support of six (6) 5 high priority areas of concern (AOCs) at the Ravenna Army Ammunition Plant (RVAAP) in 6 Ravenna, Ohio. This work is being performed under a Performance-Based Contract (PBC) in 7 accordance with U.S. General Services Administration (GSA) Environmental Advisory Services 8 Contract GS-10-F-0076J. In addition, planning and performance of all work elements is being 9 conducted in accordance with the requirements of the Director's Final Findings and Orders (DFFO) 10 dated June 10, 2004 (Ohio EPA 2004).

11

The Remedial Design (RD) describes the implementation process for the selected remedy for the contaminated dry sediment at Load Line 12 (LL12). The remedial activities that will be performed as specified in the RD will be approximately 2.31 acres. Therefore USACE/SAIC is required to develop this Storm Water Pollution Prevention Plan (SWP3) under Ohio Environmental Protection Agency (Ohio EPA) Permit No. OHC000003.

17

18 In accordance with Ohio Revised Code (ORC) 6111 and provisions of the federal Water Pollution 19 Control Act, this SWP3 has been prepared for proposed construction activities related to the 20 construction effort. The SWP3 is prepared in general conformance with Ohio EPA Authorization for 21 Storm Water Discharges Associated with Construction Activities permit requirements. Proposed Best 22 Management Practices (BMPs) shall conform to Rainwater and Land Development (ODNR 2006). 23 USACE shall submit a complete and accurate Notice of Intent (NOI) application form and 24 appropriate fee at least 21 days prior to the commencement of construction activity. In addition, the 25 procured Subcontractor shall submit a co-permittee NOI application form prior to the commencement 26 of construction activity. This SWP3 is an attachment to the RD and references the RD design 27 drawings. This SWP3 addresses control measures to be implemented as part of this design to 28 minimize storm water pollution from the construction activities.

29

30 1.1 FACILITY DESCRIPTION

31

When the RVAAP Installation Restoration Program (IRP) began in 1989, RVAAP was identified as a 21,419-acre installation. The property boundary was resurveyed by Ohio Army National Guard (OHARNG) over a 2-year period (2002 and 2003) and the total acreage of the property was found to be 21,683.289 acres. As of February 2006, a total of 20,403 acres of the former 21,683-acre RVAAP has been transferred to the National Guard Bureau (NGB) and subsequently licensed to OHARNG for use as a military training site.

38

The current RVAAP consists of 1,280 acres scattered throughout the OHARNG Camp Ravenna Joint Military Training Center (Camp Ravenna). Camp Ravenna is in northeastern Ohio within Portage and Trumbull Counties, approximately 4.8 km (3 miles) east-northeast of the City of Ravenna and approximately 1.6 km (1 mile) northwest of the City of Newton Falls. The RVAAP portions of the property are solely located within Portage County. RVAAP/Camp Ravenna is a parcel of property 1 approximately 17.7 km (11 miles) long and 5.6 km (3.5 miles) wide bounded by State Route 5, the

- 2 Michael J. Kirwan Reservoir, and the CSX System Railroad on the south; Garret, McCormick, and
- 3 Berry roads on the west; the Norfolk Southern Railroad on the north; and State Route 534 on the east
- 4 (Figures 1-1 and 1-2). Camp Ravenna is surrounded by several communities: Windham on the north;
- 5 Garrettsville 9.6 km (6 miles) to the northwest; Newton Falls 1.6 km (1 mile) to the southeast;
- 6 Charlestown to the southwest; and Wayland 4.8 km (3 miles) to the south.
- 7

8 When RVAAP was operational, Camp Ravenna did not exist and the entire 21,683-acre parcel was a 9 government-owned, contractor-operated industrial facility. The RVAAP IRP encompasses 10 investigation and cleanup of past activities over the entire 21,683 acres of the former RVAAP. 11 References to RVAAP in this document are considered to be inclusive of the historical extent of 12 RVAAP, which is inclusive of the combined acreages of the current Camp Ravenna and RVAAP, 13 unless otherwise specifically stated.

14 15

16

1.2 LOAD LINE 12 DESCRIPTION AND HISTORY

17 LL12 covers about 80 acres in the southeastern portion of RVAAP. Elevations across LL12 range 18 from approximately 970 to 987 ft amsl. Silty to clayey soil and glacial sediments overlie shale 19 bedrock at LL12, except where disturbed by RVAAP activities. A majority of LL12 was re-graded 20 and soil was disturbed during demolition activities that occurred between 1998 and 2000. Soil in the 21 former production areas contains a mix of sandy fill, sand, ballast material, slag, and residual debris 22 (e.g., metal, brick, and concrete). Surface water drainage flows generally from south to north across 23 LL12. At LL12, the Main Ditch that bisects the central part of the AOC flows from the north into 24 drainage ditches north of the AOC. The Main Ditch is heavily wooded. A stream traverses LL12 25 from west to east and intercepts the Main Ditch near the northern boundary of the AOC. Ultimately 26 the drainage flows into the Cobbs Pond complex (Upper/Lower Cobbs Pond) several hundred yards 27 to the north of LL12. However, in recent years a beaver colony has constructed dams north of LL12. 28 These structures have prevented surface water drainage from the AOC. As a result of these dams, 29 stagnant water often resides within the Main Ditch and Active Area Channel.

30

LL12 was originally known as the Ammonium Nitrate Plant and started operations on November 25, 1941. Structures related to the production of the ammonium nitrate were the Neutral Liquor Building (Building FF-19) and seven evaporation/crystallization units (Buildings 900, 901, 902, 903, 904, 905, and 906). Other structures, such as Water Works No. 2 and Power House No. 3 (Building FE-17), housed support operations. The western half of the LL12 contained former production areas. The eastern half was previously cleared, but did not contain any known production facilities.

37

38

1.3 LOAD LINE 12 REMEDIAL ACTIVITIES

39

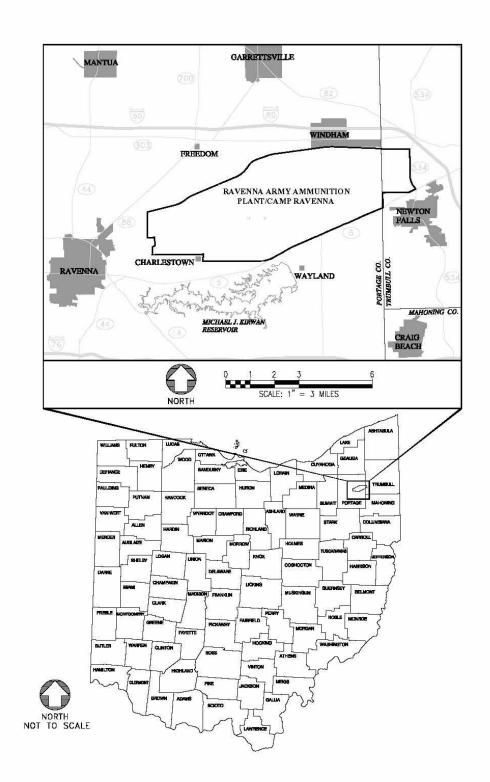
40 LL12 has had multiple site investigations performed to determine the chemical contamination (if any)
41 and the nature and extent of contamination at LL12. Contaminated dry sediment was identified in the
42 Main Ditch at LL12. The contaminated dry sediment was characterized for waste disposal prior to

1 remedial activities in accordance with Section 4 of the RD. Table 1-1 presents estimated waste

2 quantities required for removal from the LL12 Main Ditch.

- 3
- 4

			In situ	a Amounts	
	Waste Material	Surface Area	Volume ^a	Weight ^b	
	Dry Sediment (Main Ditch at LL12)	2,118 yd ²	706 yd^3	1,130 Tons	
5 6 7	^a Excavation to depth of 1 ft below ground surface (BGS) ^b Assumes 1.6 tons/cubic yard soil density.				
8	A remedial action will be performed at	LL12 in accordance	with the RD. Th	ne following activities	
9	summarize elements of the remedial acti	on:			
10					
11	• Excavate contaminated dry sediment from LL12;				
12	• Transport and dispose of contaminated dry sediment;				
13	• Confirm risk-based cleanup goals for dry sediment have been attained;				
14	• Restore excavated areas to neighboring or original contours and conditions; and				
15	• Implement post-remedial action land use controls (LUCs).				
16					
17	The remedial activities at LL12 will not	ot impact adjacent w	vetlands. The area	a within the limits of	
18	excavation will be dammed from down gradient surface water during excavation activities and				
19	appropriate storm water controls will be implemented until the 70 percent density of vegetation is				
20	achieved. Additionally storm water that	t comes in contact w	vith the excavation	n area will be filtered,	
21	containerized, and sampled to determine ultimate disposition.				



1

Figure 1-1. General Location and Orientation of RVAAP/Camp Ravenna



Figure 1-2. RVAAP/Camp Ravenna Installation Map

- **DESCRIPTION OF REMEDIAL ACTIVITIES** 1 2 3 This section provides general site information related to storm water pollution prevention in 4 accordance with permit requirements. 5 6 2.1 **SEQUENCE OF MAJOR ACTIVITIES** 7 8 Proper sequencing or phasing of major activities provides various site controls including limiting the 9 amount of disturbed area at one time. For the purposes of this plan, site activities and general phasing 10 are summarized as follows: 11 12 Phase I 13 14 1.) Notification and clearance of utilities: 15 2.) Preparation of site construction support area and installation of necessary storm water controls 16 and BMPs (specified in Attachment C, Drawing C-4): 17 a. Prepare haul truck routes and truck loading areas. 18 b. Install silt fence and sandbag dams per specifications. 19 c. Prepare storm water temporary storage tank, hoses, and pump. 20 3.) Maintain Sediment and Erosion Controls. 21 22 Phase II 23 24 After sediment controls are installed and construction support areas are prepared, excavation can 25 commence. The objective of phasing is to minimize disturbed areas and therefore minimize potential 26 issues regarding excavation water or sediment laden run-off due to storm events. Phase II shall 27 involve the following: 28 29 1.) Removal of contaminated dry sediment in the Main Ditch; 30 2.) Analytical confirmation of dry sediment removal; 31 3.) Survey limits of excavation; 32 4.) Backfill and grade excavation areas; and 33 5.) Maintain sediment and erosion controls. 34 35 Phase III 36 37 Site restoration activities will commence when excavation is complete and include the following: 38 39 1.) Final grading of backfilled excavation area; 40 2.) Installation of rip rap in bottom of Main Ditch; 3.) Installation of straw check dam in Main Ditch; 41 4.) Installation of erosion control matting and seeding on side slopes in Main Ditch; 42
- 43 5.) Grade 4 inches of topsoil over disturbed areas (if necessary);

2.0

- 1 6.) Seeding and mulching of entire disturbed area;
- 2 7.) Maintain silt fence and check dam until 70% vegetation is established, and
- 3 8.) Removal and disposal of storm water controls.
- 4

Actual phasing shall be determined with the aid of the Subcontractor Construction Supervisor, SAIC Construction Manager, and USACE Contract Officer Representative (COR). Phasing is also determined by the Subcontractor's schedule and weather conditions. Additional erosion and sediment controls may be required as the project progresses. Subcontractor will be fully responsible for the installation and maintenance of all required BMPs throughout the project.

10

2.2 ESTIMATED TOTAL DISTURBED AREA

11 12

The total construction area (limits of work) within LL12 to be disturbed is 2.31 acres and approximately 25 percent (0.56 acres) of the area will undergo excavation, transport, and disposal. The remaining construction area will be used for transportation (rock construction entrances, truck loading areas, and access gravel road), equipment staging (roll-off containers, temporary storage tanks, etc.), and areas needed for constructability and execution. These features are portrayed in Attachment C, Drawing C-4.

- 19
- 20 2
- 21

2.3 **RUN-OFF COEFFICENT**

22 Surface water drainage flows generally from south to north across LL12. A prominent drainage ditch 23 (Main Ditch) divides LL12 in half. The project area will be restored in accordance with Section 8 of 24 the RD. Existing access roads and former railroad bed will be used by haul trucks. No new 25 impervious areas will be left onsite following remedial activities. The existing impervious areas 26 (gravel and paved access roads) shall remain at project completion. The areas are classified as open 27 space for pre-construction and post-construction and will be given a runoff coefficient of 0.2 for both 28 scenarios in accordance with Table 1 in PartIII.G.2.e of the Ohio EPA Construction General Permit 29 No. OHC000003.

30

31 2.4 LOAD LINE 12 SOIL

32

Silty to clayey soil and glacial sediments overlie shale bedrock at LL12, except where disturbed by RVAAP activities. A majority of LL12 was re-graded and soil was disturbed during demolition activities that occurred between 1998 and 2000. Soil in the former production areas contains a mix of sandy fill, sand, ballast material, slag, and residual debris (e.g., metal, brick, and concrete).

37

38 2.5 RECEIVING STREAM

39

40 Construction activities shall not impact the nearest receiving body of water (drainage ditches north of 41 the Main Ditch at LL12). The Main Ditch that bisects the central part of LL12 flows to the north, into 42 drainage ditches north of the AOC. The Main Ditch is heavily wooded. A stream traverses LL12 43 from west to east and intercepts the Main Ditch near the northern boundary of the AOC. Ultimately

1	the drainage flows into the Upper and Lower Cobbs Ponds several hundred yards to the north of
2	LL12. However, beaver activity has prevented drainage of the Main Ditch to the northern drainage
3	ditches. Clearing of riparian areas, vegetation, and trees shall be minimized during remedial
4	activities. Sediment and erosion controls shall be installed prior to earth disturbing activities to
5	minimize impacts to the adjacent wetland at LL12. Construction site storm water associated with
6	disturbed areas shall be collected in a temporary storage tank for characterization and proper disposal.
7	
8	2.6 COPY OF PERMIT
9	
10	A copy of the permit to authorize storm water discharges associated with construction activities will
11	be submitted as Appendix A of this plan when it is obtained.
12	
13	2.7 SITE MAP
14	
15	A SWP3 drawing (Attachment C, Drawing C-4) has been prepared in accordance with permit
16	requirements. The drawings address the following:
17	
18	1.) Limits of earth disturbing activities;
19	2.) Existing topography;
20	3.) Surface water locations;
21	4.) Location of BMPs; and

22 5.) Storage areas and construction entrances.

3.0 **STORM WATER CONTROLS** 1

2

3 This section describes the project site storm water controls to be implemented to minimize storm water pollution from the construction activities. This section discusses the following control practices 4 5 and methods:

6		
7	•	Non-Structural
8		• Preservation methods
9		 Existing access roads
10		
11	•	Erosion Control Practices
12		• Project phasing
13		 Stabilization/seeding (temporary/permanent)
14		
15	•	Run-on and Run-off Control Practices
16		• Excavation water storage tank
17		 Dewatering berms (sandbags, cofferdams)
18		
19	•	Sediment Control Practices
20		o Silt fence
21		• Straw bale filters (check dam)
22		• Improved haul truck routes
23		
24	3.1	NON-STRUCTURAL PRESERVATION METHODS
25 26		
26 27		ubcontractor shall preserve the existing vegetation as much as feasible outside the limits of In addition, the Subcontractor shall perform the construction activities with an approach so as
27		it the amount of land disturbed at one time. Site work shall only be conducted within the
28 29		t limits.
30	projec	
31	3.2	EROSION CONTROL PRACTICES
32		
33	Erosio	n control practices minimize the transport of soil particles by concentrated flows of water or
34		The following erosion control practices shall be employed as part of the construction activities
35	at LL1	2:
36		
37	•	Project phasing; and
38	•	Stabilization/seeding.
39		
40	The Su	ubcontractor shall install all erosion control BMPs at the site, as required.

1 As detailed in Section 2, project phasing is an important tool to minimize disturbed areas and in turn

- 2 minimize erosion. Stabilization of the excavated areas is regulated under the SWP3 requirements.
- 3

In addition, upon final grade, daylight slopes and drainage ditches shall be seeded and protected by
installing biodegradable erosion control matting (or equivalent technology) to minimize soil erosion
and seed bed migration caused by storm water flow (Attachment C, Drawing C-7).

7 8

3.2.1 Temporary Seeding

9

Temporary seeding may not be required due to the project schedule. Disturbed areas will be active through project duration. However, if the SAIC Construction Manager determines that the permanent seeding may not establish due to the time of year, an annual rye grass may be placed down in disturbed areas to provide temporary cover.

15 3.2.2 Permanent Seeding

16

14

All disturbed areas must be seeded within seven days following excavation, backfilling, and final grading activities. The wetland areas shown in Attachment C-Drawing C-3 and the disturbed side walls of the Main Ditch shall be seeded with the mixture presented in Table 3-1. The walls of the Main Ditch shall be covered with erosion control matting (e.g., mulch mat) instead of straw.

- 21
- 22

Table 3-1. Full-Sun Stream/Ditch Seed Mixture for RVAAP/Camp Ravenna

Seed Type	Mixture %
Shallow/Lurid Sedge (Carex lurida)	10.0%
Blunt broom sedge (Carex scoparia)	10.0%
Fox sedge (Carex vulpinoidea)	20.0%
Riparian Wild Rye (Elymus riparius)	20.0%
Soft rush (Juncus effuses)	10.0%
Rice cutgrass (Leersia oryzoides)	5.0%
Great/Soft-stemmed Bulrush (Schoenoplectus tabernaemontani)	2.0%
Dark green bulrush (Scirpus atrovirens)	8.0%
Woolgrass (Scirpus cyperinus)	9.0%
Steeplebush (Spiraea tomentosa)	5.0%
Swamp milkweed (Asclepias incarnate)	0.5%
Blue Vervain (Verbena hastate)	0.5%

Specifications:

Broadcast at 15lbs/acre

Mulch with a minimum of 3 bales of straw per 1,000 square feet.

23

24

25 The Subcontractor will use a Camp Ravenna-approved "open area" seed mixture for permanent cover

26 for construction areas disturbed during field activities. Table 3-2 presents the seed mixture and

27 application specifications. Fertilizer and lime are not needed for seeding with native seed mixes.

1

Table 3-2. Open Area Seed Mixture for RVAAP/Camp Ravenna

Seed Type	Mixture %
Nodding Wild Rye (Elymus Canadensis)	23.5%
Virginia wild rye (Elymus virginicus)	25%
Little Bluestem (Schizachyrium scoparium)	22%
Partridge Pea (Chamaecrista fasciculate)	18.75%
Thin-leaved Coneflower (Rudbeckia triloba)	7.75%
Brown fox sedge (Carex vulpinoidea)	1.5%
Black-eyed Susan (Rudbeckia hirta)	1.5%

Specifications:

Broadcast @ 18 lbs/acre, drilled at 12 lbs/acre

Mulch with a minimum of 3 bales of straw per 1,000 ft²

2

3 Other effective materials may be used, to include specialized seeding products/technologies such as

4 seed impregnated fiber matting. Any product or technology used for seeding the Main Ditch will

5 meet the seeding requirements presented in Tables 3-1 and 3-2 and applicable Ohio EPA storm water

- 6 pollution prevention controls.
- 7

8 3.2.3 Mulching

9

Straw mulch shall be applied at a rate necessary to uniformly cover all disturbed areas; a rate of three bales per 1,000 ft² is considered sufficient. The purpose of mulching is to provide an environment for seed germination. If inspections reveal germination has not occurred within 14 days of application, re-seeding and re-mulching will be required. The restored Main Ditch at LL12 shall have erosion control matting (e.g., excelsior Type I or equivalent) placed instead of straw mulch.

15

16 **3.2.4 Irrigation**

17

18 Irrigation shall be applied as required to ensure a healthy vegetative cover. Any bare areas shall be 19 re-seeded and re-mulched. Potable water for irrigation shall be obtained by the Subcontractor from 20 an approved off-site source. Final re-vegetation is achieved once a 70% cover is obtained in all 21 disturbed construction areas, in accordance with *Rainwater and Land Development* (ODNR 2006) 22 guidance, as determined by the SAIC Construction Manager and USACE COR. Once it is confirmed 23 that at least 70% cover has been achieved, the Subcontractor is responsible for removing and 24 disposing of erosion controls.

25 26

27

3.3 RUN-ON/RUN-OFF CONTROL PRACTICES

- 28 3.3.1 Diversion Berms
- 29

The Main Ditch at LL12 discharges into the Active Area Channel which flows generally north and ultimately discharges into Upper and Lower Cobbs Ponds (approximately 650 yards north of LL12). Prior to excavation activities, the Subcontractor will install a plug in the discharging pipe at the furthest upstream location of the Main Ditch. This plug will be inspected daily. Additionally, the Subcontractor shall install dewatering berms (sandbags, temporary cofferdam, or an equivalent watertight barrier) immediately north and south of the excavation area, as shown in Attachment C-Drawing C-4, and remove all standing water from the excavation area. The water will be filtered through a sediment bag and discharged into the Active Area Channel. During excavation activities, any water accumulation in contact with an open excavation will be considered contact water, and pumped and managed in accordance with Section 5.3.2 of the RD. If the excavation extent encroaches on a dewatering berm, the berm will be relocated accordingly.

8 9

3.3.2 Excavation Water

10

11 Any water that accumulates in the excavation and comes into contact with contaminated soil or dry 12 sediment, or other waste material shall be classified as "excavation water." The Subcontractor shall 13 notify the SAIC Construction Manager of the presence of water in the excavation. Excavation water 14 shall be pumped to a temporary water storage tank provided by the Subcontractor. The Subcontractor 15 will be responsible for characterizing, labeling, transportation, and final disposal of the collected 16 water within the temporary storage tank in accordance with Section 9.2.6 of the RD. The 17 Subcontractor shall arrange for the disposition of the liquid at a suitable waste disposal facility with 18 prior approval from USACE/SAIC. The RVAAP Facility Manager will sign all waste profiles and 19 waste manifests for the disposal of project investigation-derived waste (IDW) to the approved 20 disposal facility.

21

22 **3.3.3 Soil Stockpiles**

23

Backfill may be stockpiled in the construction support area prior to backfilling the excavation areaand bounded by silt fence to prevent sediment migration.

26 27

28

3.3.4 Dewatering Berm

Downgradient of the excavation area of the Main Ditch at LL12, a dewatering berm/dam shall be constructed of sandbags, earthen material, or temporary cofferdams, as depicted on Attachment C, Drawing C-4. The dewatering berm/dam shall prevent water from back flowing from the northern portion of the Main Ditch. Water inside the dewatering berm/dam, prior to excavation, shall be pumped through a sediment filter bag to the other side. Excavation water captured during excavation activities will be managed per Section 9.2.6 of the RD.

35 36

3.4 SEDIMENTATION CONTROL PRACTICES

37

Sediment control practices are employed to attempt to remove particles from run-off. The followingsediment controls shall be implemented:

- 40
- Silt fence;
- Straw bale filters; and
- 43 Improved haul truck routes.

1 The Subcontractor shall install all sediment control BMPs at the site prior to beginning ground

2 disturbance, maintain all controls for the duration of the project, and provide additional controls as

3 required.

4

5 3.4.1 Silt Fence

6

Water resources shall be protected by the proper installation of silt fence. Silt fence shall be placed in areas of sheet flow run-off on nearly level contours. Silt fence is not intended to treat concentrated flows and shall not be placed across storm water conveyances. Silt fence shall be installed downgradient of disturbed areas, and along the haul truck route to prevent runoff to surface waters and the adjacent wetland areas at LL12 as depicted on Attachment C, Drawing C-4.

12

Approximately 2,300 linear feet of silt fence will be used during remedial activities. The silt fence
shall be removed and disposed once 70% vegetation is established and upon approval by the SAIC
Construction Manager and USACE COR.

16

17 **3.4.2 Haul Truck Routes**

18

19 LL12 will be accessed from a mixture of improved and unimproved roads located off of South 20 Service Road (Attachment C, Drawing C-6). The Subcontractor will reuse a former railroad bed 21 adjacent to the Main Ditch at LL12 as a haul truck route and loading area, which consists of existing 22 ballast material spread on the ground (Attachment C, Drawing C-3). Additional stone may be 23 required to further improve the haul truck route for truck loading and traffic. Haul trucks will 24 continue onto the improved road at the northern end of LL12. Haul trucks will exit LL12 through a 25 gate and onto Newton Falls Road. The haul truck route shall remain in place at the completion of 26 restoration activities at LL12.

27 28

29

3.5 IMPLEMENTATION SCHEDULE

Implementation of this RD will be contingent on the approval of the *Record of Decision for Soil and*Dry Sediment at the Load Line 12 (RVAAP-12) at the Ravenna Army Ammunition Plant, Ravenna,
Ohio (USACE 2009) and this RD. The start date may change based on these approvals.

33

The implementation schedule (Figure 3-1) for the RD presents an estimate timeline for implementation.

- 36
- Site preparation/set-up;
- Excavation and removal;
- Confirmation sampling;
- 40 Site restoration;
- 41 Demobilization; and
- 42 Preparation of the Construction Report.

- 1 Generally, construction activities shall occur during daylight hours (i.e., 8:00 a.m. to 5:00 p.m.) on a
- 2 5-days per week schedule. Preparation of the Construction Report shall follow conclusion of site
- 3 restoration activities.
- 4

ID	Task Name	Duration	Start	Finish	Predecessors		2010	1	
1	Remedial Design Reviews and Approval	136 days	Mon 7/13/09	Wed 11/25/09		Jul Sep Nov	Jan Mar	May Jul	Sep
÷.,	Remedial Design Reviews and Approval	150 days	1001 1113/03	1100 11/20/00					
2	Prepare and Submit Draft to Army and Ohio EPA	1 day	Mon 7/13/09	Mon 7/13/09		L			
3	Army and OH EPA Review	45 days	Tue 7/14/09	Thu 8/27/09	2	T			
4	Comment Resolution Meeting	15 days	Fri 8/28/09	Fri 9/11/09	3	ă 🕹			
5	Prepare and Submit Final to USACE	30 days	Fri 8/28/09	Sat 9/26/09	3	1			
6	USACE Preliminary Review of Final	10 days	Sun 9/27/09	Tue 10/6/09	5	ँ			
7	Prepare and Submit Final to Army and Ohio EPA	5 days	Wed 10/7/09	Sun 10/11/09	6	T S			
8	Army and OH EPA Review and Approval	45 days	Mon 10/12/09	Wed 11/25/09	7	i i i i i i i i i i i i i i i i i i i			
9	Implement Remedial Action	33 days	Thu 11/26/09	Mon 12/28/09		-	2		
10	Mobilization and Site Preparation	5 days	Thu 11/26/09	Mon 11/30/09	8	ँ हैं			
11	Excavation, Transportation, and Disposal of Sediment	10 days	Tue 12/1/09	Thu 12/10/09	10	ី 🕺			
12	Collect Confirmation Samples/Laboratory Analysis	10 days	Fri 12/11/09	Sun 12/20/09	11	<u>ै</u>			
13	Ohio EPA Review of Confirmation Samples	4 days	Mon 12/21/09	Thu 12/24/09	12	8			
14	Site Restoration	4 days	Fri 12/25/09	Mon 12/28/09	13	1 6	2		
15	Final Close Out Report	250 days	Tue 12/29/09	Sat 9/4/10					Ψ.
16	Prepare and Submit PreDraft to USACE	30 days	Tue 12/29/09	Wed 1/27/10	14	-	5 1		
17	Reviews and Approval	220 days	Thu 1/28/10	Sat 9/4/10	16		*		1

5 6

Figure 3-1. Project Schedule

1 4.0 MAINTENANCE AND INSPECTIONS

2

This section describes the preventive maintenance and inspections that shall be performed to ensurethe storm water controls are properly maintained and to determine if repairs are needed.

5

4.1 **PREVENTIVE MAINTENANCE**

6 7

8 Preventive maintenance shall be performed on equipment to ensure proper operation and to detect 9 potential leaks before they occur. Good housekeeping practices shall be maintained at all times 10 during construction activities. All employees shall practice due diligence to prevent any damage to 11 the storm water control measures. Containers shall be provided at all necessary locations for the 12 collection of trash and general construction debris. Fueling activities shall be conducted at the 13 staging area away from storm water conveyances. If a mobile fuel truck is used to re-fuel 14 construction equipment, the truck shall be staged on secondary containment with spill response 15 supplies. The secondary containment area will be inspected daily.

16

17 4.2 FUGITIVE DUST

18

19 Construction vehicle speed can be a significant component of dust generation. Vehicle speeds shall 20 not exceed the posted speed limit. As an added control, dust suppressants shall be used to minimize 21 dust generation along the service road. Water may be sprayed lightly as not to produce run-off. 22 Surface gravel, when recommended, will reduce the source of dust emission by limiting the amount 23 of fine particles available for release. Excavation activities may also require dust suppressants. A 24 water mist shall be used in minimal quantities as not to produce run-off.

25

26 4.3 DEWATERING

27

It is anticipated that dewatering activities may be necessary within the excavation area at LL12. Existing water within the limits of excavation will be pumped through a sediment bag to opposite side of the constructed dewatering berm. All excavation water encountered shall be pumped into a temporary storage tank. Dewatering activities shall not produce discharges of impacted or sediment laden water to the ground surface.

33

34 4.4 COVERS OR TARPS

35

36 Impermeable covers or tarps shall also be provided by the Subcontractor at the construction site. The 37 covers shall be utilized as an additional aid to prevent storm water from contacting the contaminated 38 dry sediment. Tarps will be placed over all exposed contaminated dry sediment, and secured with 39 sand bags at the end of each day. Sand bags placed at the perimeter shall also serve as storm water 40 diversions to minimize run-on. The tarps shall be sized appropriately to minimize overlap within the 41 excavated area. Any overlaps in the tarps shall be secured together to form a watertight seal. Run-off measures shall be evaluated and shall be installed to convey clean run-off from covers away
 from bare soil and disturbed areas. All torn sheets shall be replaced. When covers are no longer
 required they shall be completely removed and disposed of by the Subcontractor.

4 5

4.5 STREET SWEEPING

6

All public roadways shall remain sediment free. Transport of dry sediment off-site is to be controlled. Primarily, this shall be accomplished by cleaning truck tires prior to leaving LL12. Additionally, street sweeping may be required. Sweeping includes the collection and proper disposal of transported soil. Soil shall not be dispersed along public roadways via brooming techniques. In the event brooming techniques are used, all sediment shall be removed from the roadway by manual techniques.

13

15

14 4.6 SPILL PREVENTION

Spills are a source of storm water contamination. All products shall be kept in original containers
unless they are not resealable. Original labels and material safety data sheets shall be retained for all
hazardous materials to be used for the project.

19

All on-site vehicles shall be monitored for leaks and receive regular preventive maintenance to reduce the chance of leakage. Petroleum, oil, and lubricant products shall be sorted in tightly sealed containers and clearly labeled. These containers shall be stored in secondary containment and be inspected daily.

24

Spill cleanup procedures outlined in Section 12.1.2 of the Facility-Wide SHP (USACE 2001) and
pages 10 through 15 of the Installation Spill Contingency Plan (ISCP) (PIKA, 2009) shall be
understood by employees, contractors, and the Subcontractor.

28

Materials will be maintained in the established storage areas away from direct traffic routes to prevent accidental spills. A spill response kit containing equipment compatible to the materials stored will be maintained in the established storage area.

32

33 In the event of a material spill, upon discovery, on-site personnel will immediately:

34

1.) Stop the material from continuing to release if possible.

- 2.) Contain the material (e.g., diking or ditching, covering storm drains and catchment basins)
- 37 3.) Cleanup the material with chemicals, appropriate materials, and equipment. Items used may
 include brooms, shovels, rags, absorbent materials (e.g., sand, sawdust), and plastic or metal
 containers specifically designed for this purpose.
- 40 4.) Notify the security dispatcher (Guard Post 1) and the SAIC Construction Manager as soon as41 possible.
- 42 5.) Complete necessary paperwork as required by the RVAAP ISCP (PIKA 2009) and OHARNG
 43 Camp Ravenna Spill Plan.

During spill response activities, on-site personnel will wear appropriate protective clothing (e.g., goggles, gloves) to prevent contact with spilled materials. If hazardous conditions exist, response activities will cease and personnel will move a safe distance from the area and await outside emergency support.

5 6

4.7 NON-SEDIMENT POLLUTION CONTROL

7

8 Containers shall be provided for the collection of trash and general construction debris. No waste 9 materials shall be buried on-site. Fueling activities shall be conducted at the staging area away from 10 storm water conveyances. If a mobile fuel truck is used to re-fuel construction equipment, the truck 11 shall be staged on secondary containment with spill response supplies. The secondary containment 12 area will be inspected daily.

- 13
- 14 Good housekeeping practices include:
- 1516 Neat and orderly storage;
- Prompt clean up of spills; and
- 18 Minimizing off-site tracking.

5.0 INSPECTION OF CONTROLS AND PLAN REVISIONS

2

1

5.1 **INSPECTION OF CONTROLS**

3 4

5 Prior to construction activities, the Subcontractor will inspect all storm water controls (including the excavation water collection system) and document proper placement in accordance with the 6 7 Construction Quality Assurance Plan (CQAP) in Section 10 of the RD. Daily inspections of all storm 8 water controls shall be performed by the Subcontractor Construction Supervisor and documented on a 9 RVAAP Load Line 12 Remedial Action Daily Checklist. The Subcontractor also shall inspect the 10 storm water controls within 24 hours after any storm event greater than 0.5 inches of rain per 24 hour 11 period (OHC000003 Part III.G.2.i). The inspection requirements include but not limited to the 12 following items (as applicable):

13 14

15

16

18

19

21

- (
 - Construction entrances;
 - Locations where vehicles enter or exit the site shall be inspected for evidence of offsite sediment tracking.
- Non-sediment pollution control;
 - Disturbed areas and areas used for storage of materials that are exposed to precipitation shall be inspected for evidence of, or the potential for, pollutants.
- Silt fence applications;
 - Dewatering and diversion berms;
- Discharge locations shall be inspected to determine whether erosion control measures are effective in preventing significant impacts to receiving waters;
- Any secondary containment; and
 - Permanent soil stabilization.
- 25 26

Erosion and sediment control measures identified in the plan shall be observed to ensure they are functioning properly on a daily basis.

29

Qualified inspection personnel are those with documented knowledge and experience in the
 installation and maintenance of erosion and sediment controls as determined by the SAIC
 Construction Manager.

33

34 **5.2 PLAN REVISIONS**

35

Based on the results of the inspection, the SWP3 shall be revised as appropriate, but no later than 7
 calendar days following the inspection. Revisions shall incorporate placement of new BMPs if
 necessary and any newly disturbed areas.

1 6.0 POST CONSTRUCTION

2 3

4

6.1 POST CONSTRUCTION STORM WATER MANAGEMENT

5 After final grading, the site shall be re-vegetated. Re-vegetation shall be conducted in accordance 6 with Section 8.0 of the RD.

7

8 The site shall be inspected by the Subcontractor once every two weeks after re-vegetation efforts have 9 ceased. Storm water controls also will be inspected within 24 hours of a storm event (0.5 inches or 10 greater) and every 24 hours during extended rain events. These inspections ensure erosion controls 11 are effective. If vegetation has not taken root after one month, the areas shall be re-seeded. A total of 12 at least 70% vegetative cover is required prior to removal of erosion controls by the Subcontractor, as 13 determined by the SAIC Construction Manager and USACE COR.

14

15 6.2 POST CONSTRUCTION BMPS

16

17 Post-construction BMPs are not required for this project. Permanent alteration (adversely impacting)

18 the watershed and permanent installation of impervious surfaces are not proposed. The project site

19 shall be returned to a more natural condition and the watershed shall be improved.

1 7.0 NOTICE OF TERMINATION

2 3

A Notice of Termination (NOT) shall be submitted following final stabilization of the disturbed areas.

- 4 Final stabilization includes a vegetative cover with a density of at least 70% and approval from SAIC
- 5 Construction Manager and USACE COR or designee. All temporary sediment control practices are
- 6 to be removed upon final stabilization.

1 8.0 CERTIFICATION

2		
3	I certify under penalty of law that this document and all attac	chments were prepared under my
4	direction or supervision in accordance with a system designed	to assure that qualified personnel
5	properly gathered and evaluated the information submitted. Bas	ed on my inquiry of the person or
6	persons who manage the system or those persons directly respons	sible for gathering the information,
7	the information submitted is, to the best of my knowledge and bel	ief, true, accurate and complete. I
8	am aware that there are significant penalties for submitting	false information, including the
9	possibility of fine and imprisonment for known violations.	
10		
	Signed:	Date:
11		
	Signed:	Date:

9.0 CONTRACTORS CERTIFICATION

*I certify under penalty of law that I understand the conditions of the general permit OHC000003 that authorizes storm water discharges associated with construction activities and details presented in this plan identified as part of this certification.*Signed: ______ Date: ______

- 2
- ODNR (Ohio Department of Natural Resources) 2006. Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development, and Urban Stream Protection. 2006.
- OHARNG (Ohio Army National Guard) 2005. Ohio Army National Guard Approved Grass Seed Mixes for Temporary Cover and Site Closures. June 2005.
- Ohio EPA (Ohio Environmental Protection Agency) 2004. Director's Final Findings and Orders in the matter of U. S. Department of the Army, Ravenna Army Ammunitions Plant. June 2004.
- PIKA 2009. Installation Spill Contingency Plan (ISCP) for the Ravenna Army Ammunition Plant, Ravenna, Ohio. January 2009.
- USACE (U.S. Army Corps of Engineers) 2001. Facility-wide Safety and Heath Plan for Environmental Investigations at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2001.
- USACE 2009. Final Record of Decision for Load Line 12 (RVAAP-12) at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2009.

3

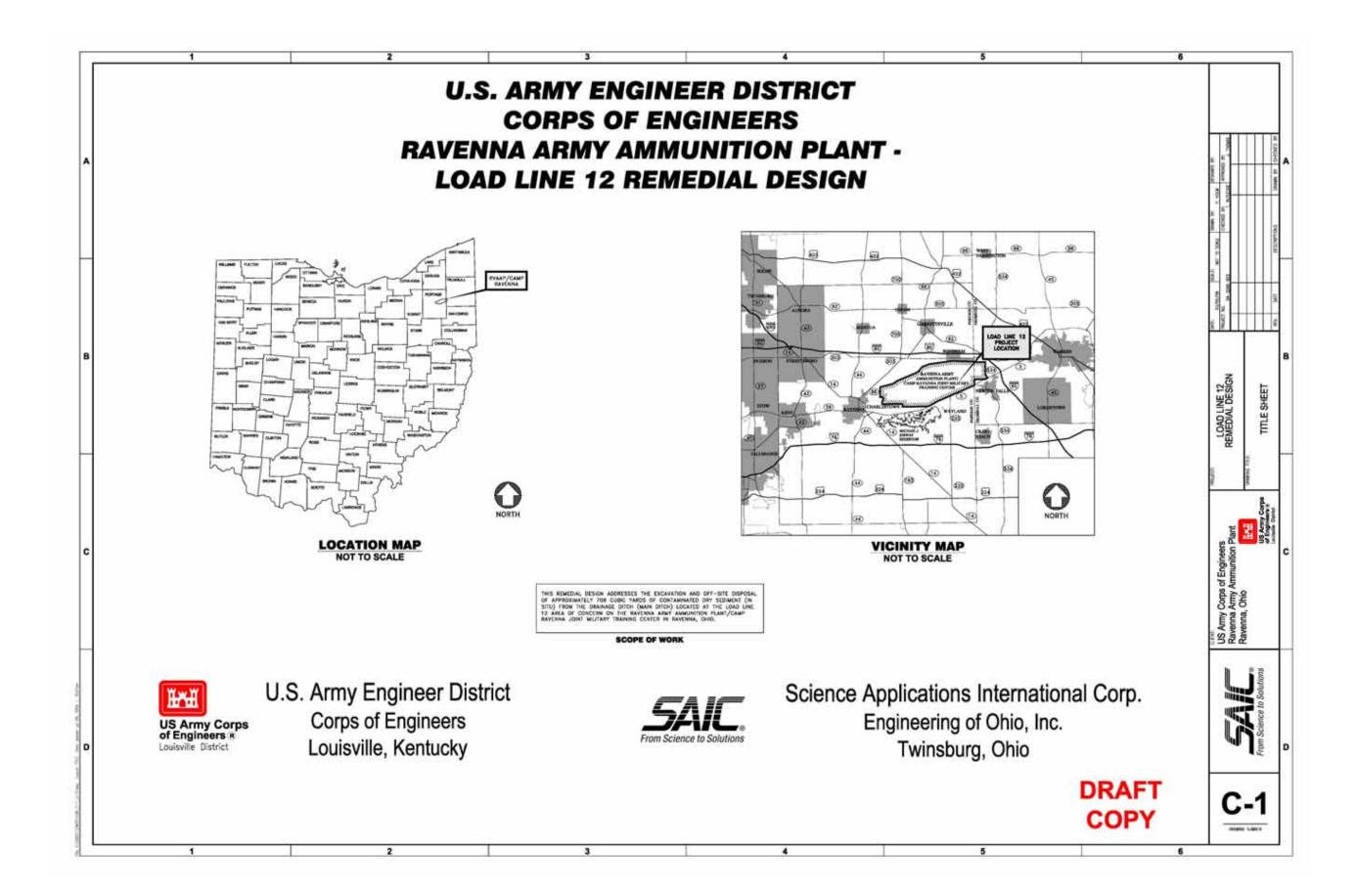
APPENDIX A

PERMIT TO AUTHORIZE STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES

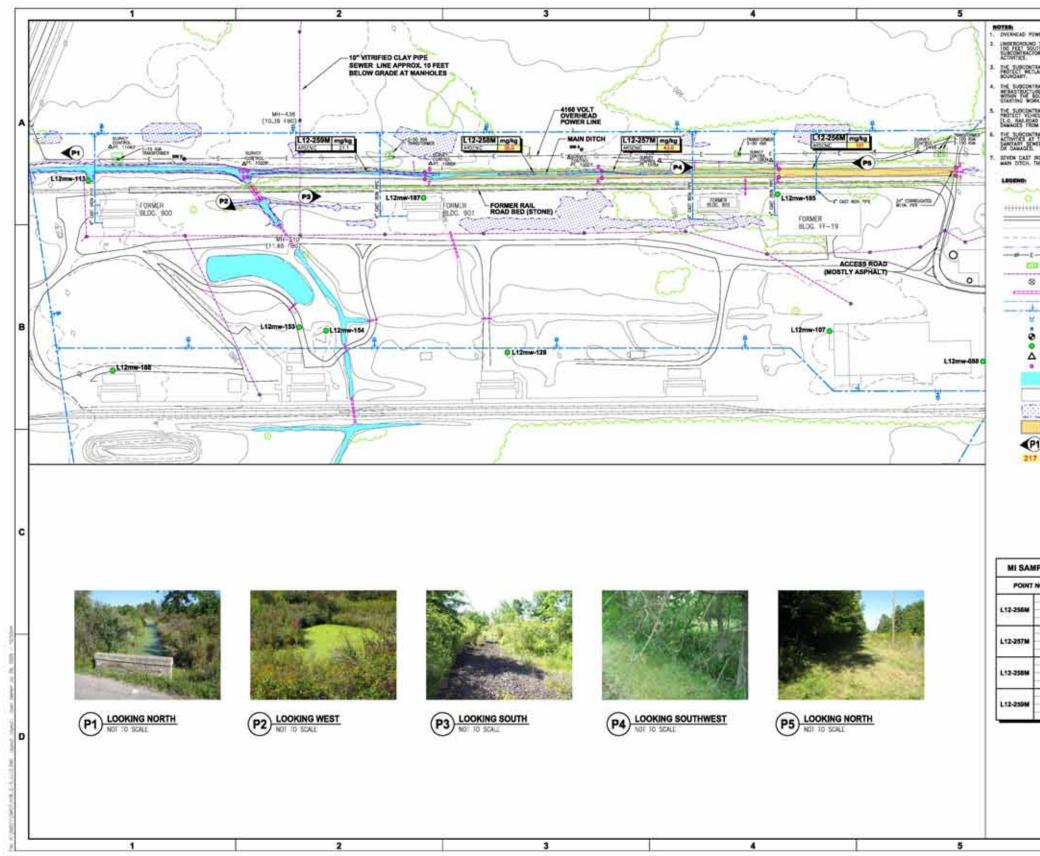
(TO BE INCLUDED WHEN OBTAINED)

Attachment C. Design Drawings:

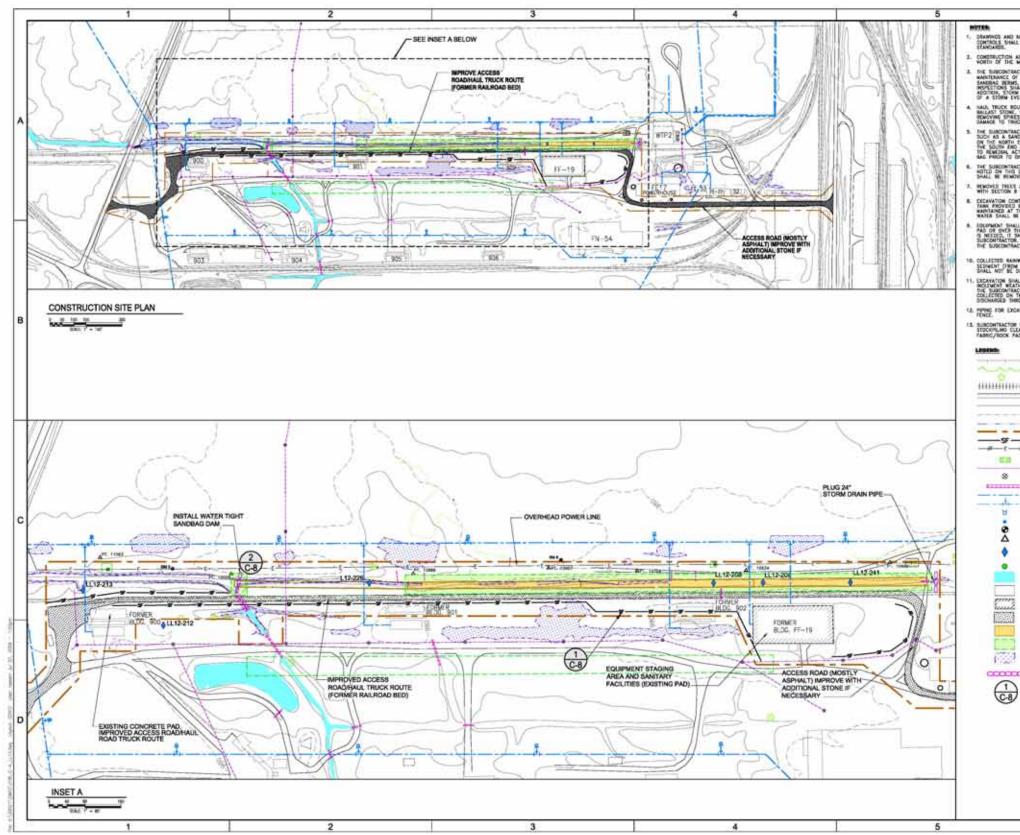
- C-1 Title Sheet
- C-2 General Notes
- C-3 Existing Site Conditions
- C-4 Construction Site Plan
- C-5 Dry Sediment Removal and Sampling Plan
- C-6 Traffic Management Plan
- C-7 Site Restoration Plan
- C-8 Construction Details



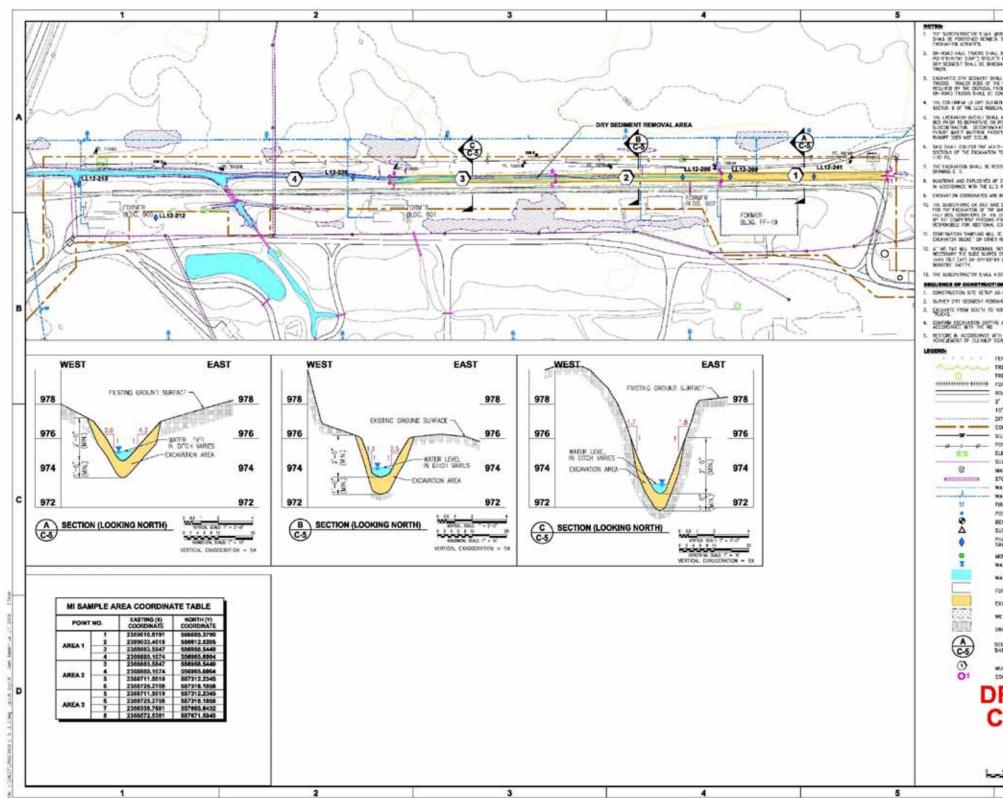
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	GENERAL	NULS		MATERIAL NOT	165		LEGEND FOR ALL DRAWINGS	-	DRAWING INDEX	-	
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	 HEREINAFTER, THE TERM "SUBCONTRACTOR" IN THESE DESIGN DRAWINGS SHALL REFER TO THE ENTITIES (I.E., THE SUBCONTRACTOR 	22. THE SUBCONTRACTOR RESPONSIBLE FOR IMPLEMENTING CONSTRUCTION ACTIVITIES SHALL BE REQUERED TO PREPARE A SITE SPECIFIC HEALTH AND SAFETY FLAN IN ACCORDANCE WITH OCCUPATIONAL, SAFETY AND	IDENTIFY A SOURC	E FOR OFF-SITE COW	- THE SUBCONTRACTOR MON FILL AND VEDETATI	IDN		C-1	TITLE SHEET		
	AND/OR ITS SUBCONTRACTOR[S]) IMPLEMENTING THE LL12 REMEDIAL DESIGN (RD) UNLESS OTHERWISE NOTED.	MEALTH ADMINISTRATION (OSMA) GUIDELINES. THE PLAN SHOULD BE SUBMITTED FOR REVIEW AT LEAST 20 CALENDAR DAYS PRIOR TO	SAMPLE SHALL BE	COLLECTED. THE SUR	S ONE MULTI- INCREMENT	SMT	HINTER RAILBOAD BED	C-2	GENERAL NOTES		
	2. THE SUBCONTRACTOR SHALL COMPLETE ALL ACTIVITIES ASSOCIATED WITH THE PROJECT IN COMPLIANCE WITH APPLICABLE LOCAL, STATE,	INITIATION OF ANY REMEDIAL ACTION ACTIVITIES. THE PLAN SHALL BE REVIEWED BY SAIC PRIOR TO INITIATION OF ANY REMEDIAL ACTION	PLACEMENT. THE M	AATERIAL SHALL BE 7	IN OF 7 DAYS PRICE TO ESTED AND COMPARED ECTION 8.0 OF THE WE.		RGAQWAY	C-3	EXISTING SITE CONDITIONS	-	
	AND FEDERAL REDULATIONS AND REQUIREMENTS.	23. THE SUBCONTRACTOR SHALL BE RESPONSIBLE FOR FOLLOWING ALL	PROPOSED OFF-ST	TE SOURCES MUST BE	E APPROVED BY OHIO EI		- 2' CONTOUR	C-4	CONSTRUCTION SITE PLAN	8	П
	 THE SUBCONTRACTOR SHALL EXECUTE ALL REMEDIAL ACTIVITIES IN ACCORDANCE WITH THE LL12 BD, DRAWINGS, SPECIFICATIONS, AND 	RVAAP, FEDERAL, STATE, AND LOCAL SAFETY REQUIREMENTS FOR THE PROTECTION OF ALL PERSONS (INCLUDING EMPLOYEES) AND	VEDETATION GROW	TH. SAIC RESERVES T	THE RIGHT (AT NO ADDIT	IONAL	10° contout	C-5	DRY SEDIMENT REMOVAL AND SAMPLING PLAN	- E	
1	ATTACHMENTS.	PROPERTY, IT IS ALSO THE SUBCONTRACTOR'S RESPONSIBILITY TO INITIATE MAINTAIN, AND SUPERVISE ALL SAVETY REQUIREMENTS.	CONSIDERED CLEAR	A. A	- monthly G NOT		ance	C-6	TRAFFIC MANAGEMENT PLAN		Ħ
	4. THE SUBCONTRACTOR SHALL SUPPLY ALL COUPMENT, WATERIALS, AND LABOR TO PERFORM THE CONTRACT REQUIREMENTS INCLUDING ALL	PRECAUTIONS AND PROGRAMS IN CONNECTION WITH THE WORK AND IN ACCORDANCE WITH THE LET'S SITE-SAFETY AND HEALTH PLAN	5.0 OR HIGHER TH	GAN 7.D TESTED IN AL	T HAVE A PH LOWER TH DOORDANCE WITH ASTM	- 120	SIT FENCE	C-7	SITE RESTORATION PLAN	11	
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	GAIN ACCESS. THE SUBCONTRACTOR SHALL BE REQUIRED TO ALLOW FOR DELAYS WITHOUT ADDITIONAL CHARGES TO RYAAP/SAIC.	25. LOCKOUT/TAGOUT PROCEDURES SHALL COMPLY WITH OSHA	ANCHORING OF ER COMPLETED IN ACC	OSION AND SEDIMENT. CORDANCE WITH THE	WATION CONTROLS SHALL WANUFACTURERS	95	WATER SUPPLY LINE			8 4	
	7. TOPOGRAPHIC MAPPING DATA IS BASED ON SURVEY AND AERIAL	REQUIREMENTS.	RECOMMENDATIONS		RAINWATER AND LAND		BOST NOCATOR WAYE			8	
ł	PHOTOGRAPH INFORMATION MINOR DISCREPANCES BETWEEN DRAWINGS AND ACTUAL TIELD CONDITIONS SHALL NOT BE CAUSE FOR	26. ALL ELECTRICAL WORK SHALL BE DONE IN ACCORDANCE WITH THE MOST CURRENT EDITION OF THE NATIONAL ELECTRIC CODE.		-95 B.			POST INDICATOR VALVE SUBSURFACE SANITARY LINE			8	
1	ADDITIONAL PAYMENT, IT IS THE SUBCONTRACTOR'S RESPONSIBILITY TO VERIFY EXISTING CONDITIONS, ELEVATIONS, AND DIMENSIONS PRICE TO THE START OF CONSTRUCTION AND NOTIFY SAID OF CONFLICTS.	27. ALL FUEL AND/OR PETROLEUM PRODUCTS (E.G., LUBRICATES) SHALL BE STORED AT THE EQUIPMENT STADING AREA WITHIN SECONDARY					S MINHOLS			ä .	
	A. THE SUBCONTRACTOR SHALL INSTALL CONSTRUCTION SIGNS AT THE	CONTAINMENT, FUEL STORAGE CONTAINERS WILL BE DOUBLE LEAK-PROOF WITH A REGULATORY STANDARD ANDUNT OF					TIONA DRAIN PIPE				+
	LOCATIONS INDICATED ON DRAWINDS C-6 PRIOR TO INITIATION OF SITE PREPARATION ACTIVITIES.	FREE-BOARD, ALL FUEL CONTAINERS AND/OR TANKS WILL BE PROPERLY PLACARDED AND SECURED ACCORDING TO OSHA AND DOT	202		-	_	A SURVEY CONTROL POINT			16-31	
	8. THE SUBCONTRACTOR SHALL CONTACT THE RVAAP FACILITY WARAGER	RECULATIONS AND ADEQUATE SPLL CLEAN-UP EQUIPMENT AND MATERIALS WILL BE MAINTAINED AT THE FUEL-STORAGE SITE.	Lis	T OF SPECIFIC	ATIONS		O BENCHMARK			â y	11
	AT LEAST 25 CALENDAR DAYS PRICE TO CONSTRUCTION ACTIVITIES TO COORDINATE UTILITY SURVEY AND CLEARANCES. THE IDENTIFICATION AND DESTROY OF THE OWNER OF DESTROY OF DESTROY OF THE OWNER OWNER OF THE OWNER OF THE OWNER OF THE OWNER	38. ALL STORM WATER CONTROLS AND FUMP EQUIPMENT SHALL BE					WOMTORING WELL			8 8	11
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I	10. STORWWATER CONTROLS SHALL BE INSTALLED FRIDE TO INITIATION OF	28. THE PROJECT SITE IS CONSIDERED TO BE THE LOAD LINE 12 (LL12) AREA OF CONCERN (ACC).					COCCOO SANDBAGS				
1	ANY CONSTRUCTION ACTIVITY THAT WAY CAUSE EROSION OR SEDIMENTATION, STORWWATER CONTROL WEASURES SHALL BE	30. THE SUBCONTRACTOR WILL PROVIDE ALL NECESSARY ON-SITE SPILL EQUIPMENT (I.E. GRANULATED CLAY, ABSORDENT BLANKITS, PPE,					STRAW CHECK DAW				
	MAINTAINED AND REINSTALLED AS NECESSARY FOR THE DURATION OF CONSTRUCTION AND RESTORATION ACTIVITIES.	SHOVELS, CONTAINERS), ALL SUBCONTRACTOR EMPLOYEES ON-SITE SHOVELS, CONTAINERS), ALL SUBCONTRACTOR EMPLOYEES ON-SITE SHALL BE TRAINED ON PROPER USE OF SPIL, EQUIPMENT AND					HAUL TRUCK TRAFFIC ROUTE			z	
	11. AT A WINNUM THE SUBCONTRACTOR SHALL PLACE EROSION CONTROLS WHERE INDICATED ON THE DRAWINGS, ADDITIONAL	CLEAN-UP OF IMPACTED MATERIAL IN THE EVENT OF A SPILL.				-	FORMER BUILDING LOCATION	1 122		Sig 2	Ĕ
	CONTROLS MAY BE REQUIRED, DEPENDING ON SITE CONDITIONS, EROSION CONTROL MEASURES SHALL WEET ALL FEDERAL AND STATE	31. REMEDIAL DESIGN WORKPLAN AND SPECIFICATIONS SUPERSEDE DRAWINGS DETAILS IN EVENT OF CONFLICTS.	ESTIM	ATED WASTE Q	VANTITIES		BUILDING LOCATION	LIS	T OF PERMITS AND NOTIFICATIONS	AL DE	CN CN
	REQUIREMENTS.	52. A UXO TECHNICIAN WILL BE ON-SITE THROUGHOUT THE REMEDIAL ACTIVITIES. THE UXO TECHNICIAN LEVEL OF GUALIFICATION WILL BE		ESTIMATED	IN SITU AMOUNTS		WATER	1. USPWS SHE	ANGERED SPECIES PROTECTION NOTIFICATION	DU	NA N
	 THE SUBCONTRACTOR MAY OBTAIN POTABLE WATER FOR CONSTRUCTION PURPOSES FROM EXISTING RVAAP FACULTIES. ANY HOSE CONNECTED TO A FIXED POTABLE WATER SUPPLY MUST BE 	ACTIVITIES. THE UXD TECHNICIAN LEVEL OF GUALFICATION WILL BE OFTERMINED BY USACE, THE UXD TECHNICIAN WILL BE PROVIDED BY THE SUBCONTRACTOR.			VOLUME WER	HT (1)	EQUIPMENT STADING AREA &	2. OHO FROT	ECTION OF HISTORIC PROFERITES	MEDIA	E N
	HOSE CONNECTED TO A FIXED POTABLE WATCR SUPPLY MUST BE EQUIPPED WITH BACKFLOW PREVENTION ON THE SUPPLY CONNECTION BEFORE CONNECTION THE HOSE. COORDINATION WITH THE RVAAP/SAC	33. A SPILL KIT, FIRST AD KIT, AND HEALTH AND SAVETY FLAN (NASP)	WASTE MATERIAL	(YD2)		SHS)	Exect2 SANITARY FACILITIES		ANCE REVIEW BY USACE, HUNISVILLE SERVICE CENTER	REP	E
-	SHALL BE WITATED DURING MOBILIZATION IN ORDER TO PROVIDE SUFFICIENT THE TO DETAIN ACCESS TO THE DENTIFIED POTABLE	SHALL BE MAINTAINED ON-SITE BY THE SUBCONTRACTOR DURING CONSTRUCTION ACTIVITIES. THE SUBCONTRACTOR IS RESPONSIBLE FOR	HONHAZARDOUS DITY	2118	206 11	30	IMPROVED ACCESS/HAUL TRUCK HOUTE	4. OHIO EPA (NPDES) S	NATIONAL POLLUTANCE DISCHARGE ELIMINATION STSTEM IDRMWATER PERMIT NO. OHOSODOD3	100 g	
	WATER SUPPLY, POTABLE WATER SUPPLIES SHALL NOT BE ACCESSED WITHOUT CONSENT FROM RVAAP/SAIC.	REEPING THE SPILL KIT AND FIRST AID KIT SUPPLIED AS NECESSARY.	SUMERT				GRADE, SEED & STRAW AREA	S. WETLANE S		10 10 10 10 10 10 10 10 10 10 10 10 10 1	
	13. IF UNDIPECTED WATERIALS , SUCH AS NEC OF ARCHEOLOGICAL	34. PRICE TO THE START OF DALL CONSTRUCTION ACTIVITIES THE SITE HEALTH AND SAFETY OFFICER IN CONJUNCTION WITH THE JAKO TECHNICIAN WILL CONJUCT AND RECORD DALLY TALCATE MEETINGS.					A" TO 6" STONE	1.3.331.177.3.47.43		ALC: N	
	ARTIFACTS ARE DISCOVERED DURING REMEDIAL ACTIVITIES, THE SUBCONTRACTOR SHALL STOP WORK IMMEDIATELY AND NOTIFY	ACORESSING THE POTENTIAL HAZARDS ASSOCIATED WITH THE PLANNED CONSTRUCTION ACTIVITIES.					EXCAVATION AREA				2
	RYAAF/SHC. THE SUBCONTRACTOR SHALL NOT RESUME WORK UNTR. APPROVAL IS GRANTED BY RYAAF/SAIC AND THE SITE SAFETY AND MEALTH OFFICER.	35. SUBCONTRACTOR SHALL PROVIDE & CERTIFICATION OF THE					CLEAN BACKFILL				E.
	14, SHOULD THE SUBCONTRACTOR DISCOVER UTUITIES NOT SHOWN ON	DECONTAMINATION OF ALL EXCAVATION EQUIPMENT PRIOR TO REMOVING THE EQUIPMENT FROM THE CONSTRUCTION SITE.	101000000000000000000000000000000000000			-	CLEARING & CRUSSING				E
	THE DRAWINGS, EXCAVATION ACTIVITIES SHALL STOP IMMEDIATELY AND THE SUBCONTRACTOR SHALL NOTIFY RVAAP/SAIC. RVAAP/SAIC AND	36. MANHOLE COVERS COULD POSSIBLY BE MISSING SUBCONTRACTOR SHALL TAKE CARE NOT TO DISTURB EXISTING SANTARY & STORM	ESTIMATED RES	TORATION MA	TERIAL QUANTIT	115				ant	SA
	THE SUBCONTRACTOR SHALL DETERMINE THE DISPOSITION OF THE DISCOVERED UTILITY. THE SUBCONTRACTOR SHALL NOT RESUME WORK	WATER SEWER LINES.	MATERIAL TY	ME	QUANTITY		WEILAND AREA			S C	3
1	UNTIL APPROVAL IS GRANTED BY RVAAP/SAC AND THE SITE SAFETY AND HEALTH OFFICER.	SUBCONTRACTOR SHALL REMOVE ANY RALROAD STAKES IN THE FORMER RAIL ROAD BED TO PROTECT EQUIPMENT TIRES.				_	CRADE, SEED & STRAW AREA		LIST OF SUBMITTALS	e é é	
	15. NO WORK SHALL TAKE FLACE DURING INCLEMENT WEATHER (AS	SUBCONTRACTOR COULD OVERLAY STONE TO COVER AT OWN REF. SAID IS NOT RESPONSIBLE FOR GAMAGE TO VEHICLES.	HG. 2 STONE	AS	NEEDCD		GROUND SURFACE (UNDISTURBED)	1500-000-0		5	
	DETERMINED BY RVAAP/SAIC) TO MINIWZE THE POTENTIAL FOR EROSION AND SEDIMENT RUNOFF.		RP ANT	241	TONS (2)		DETAIL WITH DRAWING	그는 말을 알을 얻을	AND HEALTH PLAN CISHIPS ADDIVIOUN	Ame	
	16. DURING INSTANCES OF HIGH WINDS, WHICH COULD RESULT IN EXCESSIVE DUST, RVAAP/SAIC RESERVES THE RIGHT TO REGURE		CANZA -		0.0645.20		C-1 SHEET NUMBER		IN POLLUTION PREVENTION PLAN (18973)	de lo	
	ADDITIONAL DUST CONTROL OR TO STOP WORK. THE SUBCONTRACTOR SHALL BE REQUIRED TO ALLOW FOR DELAYS WITHOUT ADDITIONAL		FILL MATERIAL		ROXIMATELY EQUAL TO AVAILED MATERIAL		A SECTION WITH DRAWING	1. BADATIL SA		A S S	
	CHARGES TO SAIC.				IS LINCAR FEET		C-1 SHEET NUMBER	 VEIETATVE CONSTRUCT 	CONTR (TOP SOL) SAMPLE RESULTS	An	
	17. THE SUBCONTRACTOR SHALL HOT ALLOW HAUL TRUCKS TO TRACK SOL/MUD ONTO PUBLIC OR RVAAP ROADWAYS. THE SUBCONTRACTOR		SILT FENCE	230	- 100000 1251		PHOTOGRAPH NUMBER	6. BASTE PRO		Rav	
	SHALL INSPECT ALL HARL TRUCKS WITHIN THE INSPECTION AREA BEFORE RELEASE TO PUBLIC ROADS, SOIL REMOVED FROM HARL		HULCH BLANKET/FABRIC	8,75	03 50. 47. (3)			1.00 C 1.00 C 1.00 C	L WANTESTS FOR CONTINUATED DRY SEDMENT	-	_
	TRUCKS SHALL BE COLLECTED AND DISPOSED OF WITH EXCAVATED DRY SEDMENT. ALL MAUL TRUCKS SHALL BE COVERED PRIOR TO DEPARTURE FROM THE PROJECT SITE.			(11) (11)	BALTS (4)	-		0.000000	IN SHIPLE RESULTS	- 10 A	
	18. THE SUBCONTRACTOR IS RESPONSIBLE FOR IMMEDIATELY REMOVING		STRAM BALES	40	BALES (4)					1 1 1	ion i
	ANY MATERIAL SPILLED ON ROADWAYS OR TRACKED DURING IMPLEMENTATION OF THIS REMEDIAL DESION. THE SUBCONTRACTOR		WETLAND SEED	7 1	95 (7)	-		-		Silling Street	oth
	SHALL NOTITY SAVE OF ANY OCCUBRENCES.		Analysis and	- 123	the fail		SURVEY CONTROL POINTS				to 5
	 THE SUBCONTRACTOR SHALL COORDINATE ALL WASTE MANAGEMENT ACTIVITIES WITH WAAR/SAC, WASTE HANDLINE AND DISPOSAL ACTIVITIES WITH WAAR/SAC, WASTE HANDLINE AND DISPOSAL 		GRASS BLED		URS (5)		POINT NO. MORTHING EASTING ELEVATION				BOR
	ACTIVITIES BUALL BE CONDUCTED IN ACCORDANCE WITH THIS HEWEDIAL DESIGN, RVAAF REQUIREMENTS, AND APPULABLE STATE AND FEDERAL REQULATIONS.		NOTES				10005 556039.07 2368997.16 882.16				Scie
	20. ALL ERCAVATED CONTAMINATED DRY SEDWENT SHALL BE DISPOSED		1. ASSUMES 1.8 TONS/	CUBIC YARD SOL DE	HSITY/		10006 555241.55 2369153.50 961.08			A	E
1	AT A REGULATED LANDFILL APPROVED BY RVAAP/SAIC.		2. ASSUMING 100 LBS/	Y57.			10007 557355.37 2558724.08 878.05 10008 556039.70 2558435.08 878.35	-		1 2	é.
	21. ALL HAUR, TRUCKS TRAVELING ON PUBLIC ROADS SHALL HAVE A BRL OF LADING OR WAMPEST SIGNED BY THE RVAAP FACILITY MANAGER.		3. ASSUMING A DISTUR	RED AVERAGE SINGLE	SIDE SLOPE LENGTH 3.1	п	10493 556518.07 2559171.01 980.45		DDAFT		_
			4. ASSUMING AN APPLIC AREAS CIVER THAN		ALES PER 1,000 SO. FT.	FOR	10496 556701.50 2559032.30 977.73 10534 556988.81 2556891.24 977.54	-	DRAFT		
			S. ASSUMING AN APPLO		LBS/ACRE. FOR AREAS C	THER	10754 557211.86 2358795.55 876.76	-		0	-
			THAN MAIN DITCH.				10888 557647.28 2356595.26 975.21 11063 558322.12 2358358.41 976.70		COPY		1
			6. SUBCONTRACTOR SHA 7. ASSUMING AN APPLO				A SURVEY CONTROL POINT				
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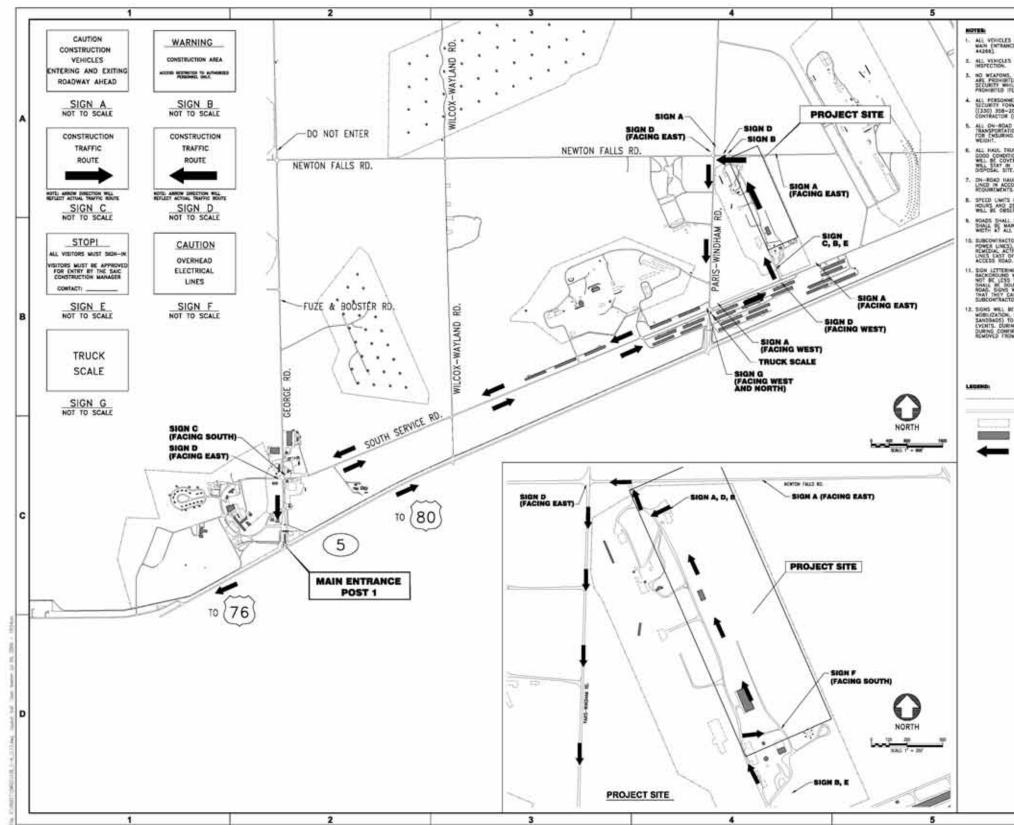
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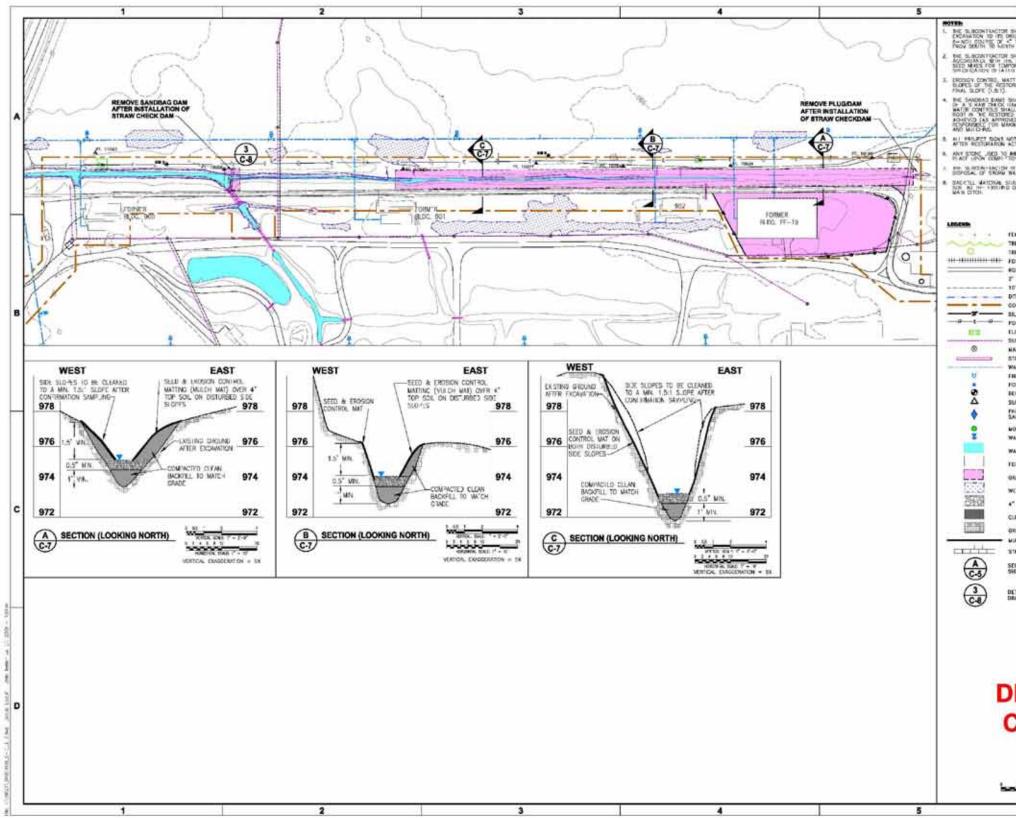
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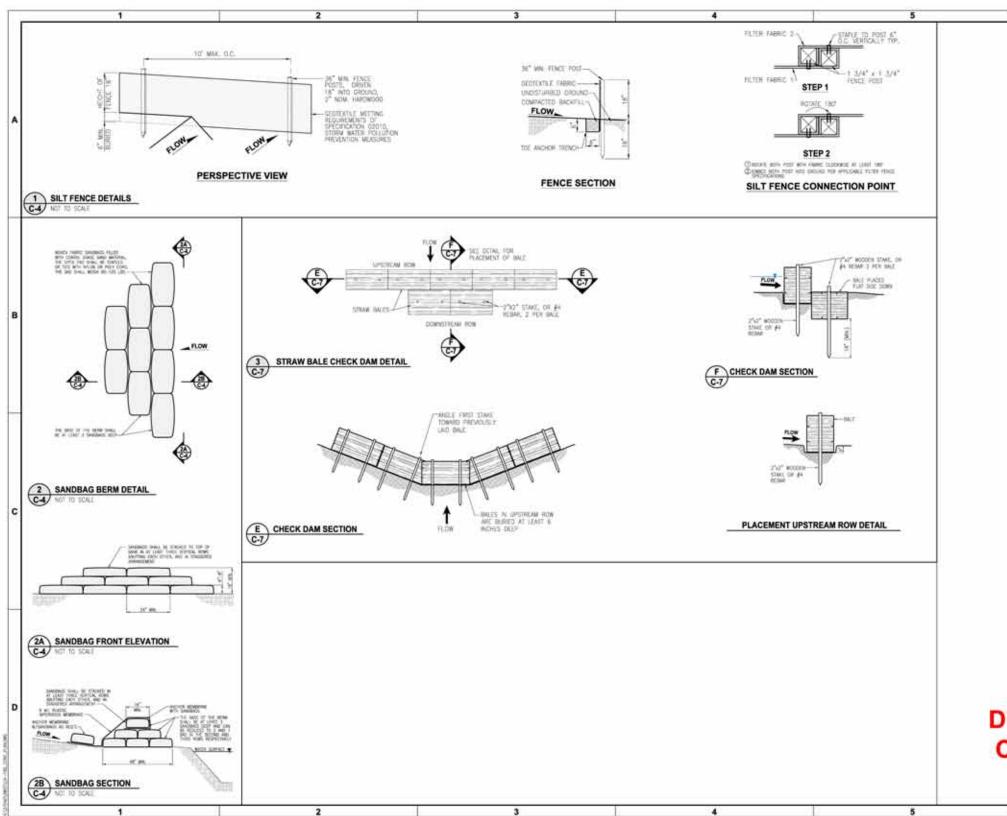
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AD HAL	) 356-3005) BEFORE ARRYING AT THE PLANT. L TRUCKS WILL ACHERE TO GOOT UPLIARS. THE SUBCONTRACTOR IS RESPONSIBL CKS DO HOT EXCLED BLOOD LINE. GROSS	-4 Choine	$\mathbb{H}$	1	^
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LOAD LINE 12 REMEDIAL DESIGN	В
US Army Corps of Engineers US Army Corps of Engineers Ravenna, Ohio	C
From Science to Solutions	D
6 C-8	

Attachment D. Construction Forms and Checklists

### **RVAAP Load Line 12 Remedial Design**

DAI	LY CI	HECK	LIST				DATE:
Арр	roxim	ate To	rainfall:		Weather C	last rainfall: ondition:	Inches
Yes	<u>No</u>	<u>N/A</u>					
			DAILY TAILGATE S	AFETY BR	RIEFING AND FOR	M COMPLETED	
			DAILY INSPECTIONS	S			
			SWP3 controls (bern	ns, silt fen	ce, inlet protectio	n, etc.) Morning Ins	pection:
_		_	Time Completed:		· •		
			Is standing water pres	ent?			
			Is excavation water pr	esent?			
			If yes, describe action	:			
			Are there structural co	ontrols in nl	ace? If yes compl	ete table below	
				•			
			Type of Control	Location	of Control	Condition of Control	Sediment Depth
						Control	(Inches)
			Any Maintenance requ	uired:			
			Work to be performed				efore:
				,			
			General Work Area I	nspection			
			Time Completed:	-			
			Work area in good sha			escribe actions taken.	
							Page 1 of 4

Intials

.

DAIL	Y CH	IECK	LIST DATE:
Yes	<u>No</u>	<u>N/A</u>	
			Main construction entrance free from soils? If no, describe actions taken. Is excavation covered nightly and during inclement weather? If no, describe actions taken. Is spill kit maintained onsite and inspected daily? If no, describe actions taken. Are fuel tanks stored with secondary containment? If no, describe actions taken. Is there continuous dust in construction area? If yes, describe actions taken. Comments/Actions taken:
			Equipment Inspection Time Completed: Is Frac Tank near capacity (17,500 gallons)? If yes, describe actions taken. Is Frac Tank leaking? Is there evidence of wall failure? If yes, describe actions taken. Are pumps and hoses functioning properly, without leaks? If no, describe actions taken. Are excavation vehicles operating correctly? If no, describe actions taken. Are orange safety flags visible and clean on excavation equipment? If no, describe actions taken. Is there any visible leaking fluids (i.e. oil, hydraulic, coolants)? If yes, describe actions taken.
			Roll-off Boxes Trucks Excavation Area Inspection Time Completed: Depth of excavation:ft Width of excavation:ft
			Length of excavation:    ft     Soil Type:

Page 2 of 4

DAIL	Y CH	IECK	LIST		DATE:
Yes	No	<u>N/A</u>			
			Crossing excavation prevented (> ft).		
			Personnel kept away from sidewalls.		
			Equipment and spoils at least two feet from edge.		
			Cave in protection needed.		
			Cave in protection adequate Type of Prote	ection:	
			Excavation sloped. If yes, what angle:	<u> </u>	
			Water kept out of excavation. If no, describe action	ons taken.	
			Excavation work WITHOUT entry. If no, contact F controls measures (i.e. safe entry exit, hazardous		entry for additional
			PHOTOGRAPHS TAKEN		
			What was photographed	Number taken (photo	log numbers)
			DAILY MEASUREMENTS OF EXCAVATION AF	REA	
			<ul> <li>estimated volume/tons</li> </ul>		
			<ul> <li>number of trucks</li> </ul>		
			COMPLETED TRUCK INSPECTION FORMS		
			COORDINATE WITH CONTRACTOR ON NEXT	DAY'S EXCAVATION	PLAN

- Excavation area

   Number of trucks available
- U U Weather forecast
- EXCAVATOR BUCKET WRAPPED IN POLY AND SECURED
- DAILY COVER (EXCAVATION)

DAIL	Y CH	IECK	LIST	DATE:
<u>Yes</u>	<u>No</u>	<u>N/A</u>		
			EQUIPMENT AND SAFETY FENCE SECURED AROUND EXCAVATIO	N AREA
			LOG BOOK COMPLETED	
			ARE SHIPPING PAPERS/MANIFESTS READY FOR NEXT WORK DAY	Y
			COMPLETED SWPS INSPECTION AFTER RAIN EVENT DURING WO	RKING HOURS.
			END OF DAY INSPECTION	
			SWP3 controls (berms, silt fence, inlet protection, etc.) End of Day In	nspection:
			Time Completed:	
			Is standing water present?	
			Is excavation water present?	
			If yes, describe action:	

Are there structural controls in place? If yes, complete table below.  $\square$ 

Type of Control	Location of Control	Condition of Control	Sediment Depth (Inches)

Any Maintenance required:

Work to be performed by:_____On or before:_____

QA By:_____

Page 4 of 4

_____

DAILY REPORT		DATE:
Weather Condition	A.M.	
	P.M.	
Subcontractors On-Site		
Equipment On-Site		
Visitors On-Site		
Work Performed		
work Performed		
Unexpected Materials Encountered		
Soil Characteristics and Properties		
Schedule Status/Update		
Deviations from Approved Removal		
Plans and Specifications		
Summary of		
Communications		
Corrective Action and/or Recommendations for		
Corrective Action		
Comments		
Comments		

Completed by: _____

Conducted by:

I have been briefed by the Site Safety and Health Officer or designated alternate on the potential safety hazards associated the following planned work activities for today:

1	
2	
3	
4	
5	
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7	
8	
10	
11	
12	
13	
14	
15	
Signature:	Print Name:
Signature:	Print Name.
Signature:	Print Name:
Signature:	Print Name:
<u> </u>	
Signature:	Print Name:
~	
Signature:	Print Name:
Signature	Drint Nome
Signature:	Print Name:
Signature:	Print Name:
Signature:	Print Name:
Signature:	Print Name:
Signature:	Print Name:
Signatures	Print Name:
Signature:	Print Name:
Signature:	Print Name:
Signature:	Print Name:

SSHO Signature:_____

### CAMP RAVENNA FIRST RESPONDER REPORTING FORM (Print all information)

Collect as much of the information on the top half of this form as possible before making initial notification. Complete the top and bottom of the form before turning in to Camp Ravenna.

Name of individual reporting spill:
When did the spill occur (Date and Time)?
Spill Location (Building or area name / number, indoors or out; if vehicle involved, type and bumper number):
What was spilled?
Rate at which material is currently spilling
Extent of spill travel?
Did the spill reach water (ditch, creek, stream, pond, well head)
Number of injured personnel and type injuries, if applicable
Do you need the Fire Department to respond to protect life, property, and environment?
Unit: Report Date & Time:
On Scene Coordinator Name and Grade: Phone: Phone:
On Scene Coordinator Name and Grade: Phone: _
How did the spill occur (be specific)
How did the spill occur (be specific)
How did the spill occur (be specific)
How did the spill occur (be specific)
How did the spill occur (be specific)
How did the spill occur (be specific)

Initial information is critical. Get as much information as you can, but don't hesitate to make the initial notification if a spill is moving or worsening rapidly!

This form must be completed for all releases and turned-in to Camp Ravenna Range Control within 24 hours.

### FIRST RESPONDER SPILL/RELEASE RESPONSE ACTIONS

Units or contractors performing training or other operations at Camp Ravenna shall be responsible for adhering to the provisions identified in the Camp Ravenna Integrated Contingency Plans (ICP). A copy of the ICP may be obtained from the Camp Ravenna Environmental Supervisor. Following discovery of a spill (any size), the procedures outlined below shall be executed where applicable:

- 1. If necessary, initiate evacuation of the immediate area.
- 2. Notify Camp Ravenna Range Control via two-way radio or by calling <u>(614) 336-6041</u> or (614)336-6562, and report information contained on the "First Responder Reporting Form" if it is known or can reasonably be determined. This form has been copied on the opposite side of this page.
- 3. Stop spill flow when possible without undue risk of personal injury.
- 4. If trained, contain the spill using available spill response equipment or techniques.
- 5. Make spill scene OFF LIMITS to unauthorized personnel.
- 6. Restrict all sources of ignition when flammable substances are involved.
- 7. Report to the OSC upon his/her arrival to the scene.
- 8. Turn in a completed copy of the First Responders Form to Camp Ravenna Range Control for ALL releases, even ones cleaned up by the reporter.

#### TELEPHONE NUMBER

When Camp Ravenna Range Control is not available, the Camp Ravenna On-Scene Coordinator (OSC) must to be contacted by the discoverer/first responder following a release if it is in water, at or above a reportable quantity (25 gallons or more), a hazardous or extremely hazardous substance, a hazardous waste, or involves fire, explosion, or is otherwise a major incident.

NAME	JOB TITLE	OFFICE	24 HOUR
Camp Ravenna Range Control	<b>Operations and Training</b>	(614)336-6041 or 6562	Contact Alternate
Tim Morgan (Primary OSC)	Environmental Supervisor	(614)336-6568	(330)322-7098
Katie Elgin	Environmental Specialist	(614)336-6136	Contact Alternate
SFC Chad Baucum	Range Operations	(614)336-6562	(330)575-6585
MAJ Richard Saphore	Logistics Officer	(614)336-6790	(614)593-1654
LTC Ed Meade	Garrison Commander	(614)336-6560	(614)307-0493

**Off-site (from RTLS area code 614 phones)** 

comply with all the requirements outlined herein.	
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:

### RVAAP Load Line 12 Remedial Design Manifest Log

Disposal Date	Type of Waste	Source/ Location	Date of Generation	Transporter	Truck License No.	Disposal Facility	Waste Profile No.	Manifest Document No.	Facility Quantity (tons)	Copy of manifest leaving site (Y/N)	Signed Manifest Rec'd (Y/N)	Signed Manifest to Regs (Y/N)	Notes

Date:	Time:
Weather: (include days since last rainfall and amount in	inches of last rainfall)
SILT FENCE INSPECTION Are silt fences intact? If no, describe status when arrived at site and maintenand	Yes No
Percentage of grass cover at construction footprints?	
Where photos taken at the site ?	Yes 🗌 No
CHECK DAM ISPECTION Is Check Dam intact? If no, describe status when arrived at site and maintenand	Yes No
SITE INSPECTION Is the site in good shape (e.g., no debris)? If no, describe status when arrived at site and maintenand	Yes No
immediately to coordinate site improvements. ADDITIONAL COMMENTS	ne during the inspection, please contact the Project Manager

## **RVAAP Load Line 12 Remedial Design** Site Restoration Inspection Form

Date/Time:	Completed by:	
SITE RESTORATION INSPECTION		
Final grading completed and vegetative layer installed?		Yes No
Temporary SWP3 controls removed?		
Final SWP3 controls installed?		Yes 🛄 No
Were all disturbed areas seeded/hydroseeded?		Yes 🗌 No
Is seed established? (70% coverage is required)		Yes 🗌 No
Is silt fencing intact?		Yes 🗌 No
Signs of erosion (cracks/ruts/gullies/minimal grass cover	erage/slope failure)?	Yes 🗌 No
Maintenance required for above issues:		

## RVAAP Load Line 12 Remedial Design Truck Inspection Form

Date/Time: Comple	eted by:
Truck/License Number: Truck	ing Company:
Type of Load Hazardous Waste Soil or Non-hazardous	Waste Soil (circle one)
Is the truck lined (if required by disposal facility)?	Yes 🗌 No
Are all sides of truck and its wheels cleaned of all debris? If no, describe actions taken.	Yes 🗌 No
Is the truck covered?	Yes 🗌 No
Is waste manifest (or shipping papers) completed and in the	e truck? Yes No
Comments:	

### RVAAP Load Line 12 Remedial Design Visitor Log

I have been briefed on the potential hazards on the work site. I hereby agree to comply with all safety requirements during my visit and will follow the instructions of the Site Safety and Heath Officer.

Print Name	Signature	Agency	Date/Time	Reason for Visit

## Attachment E

## Land Use Controls for Soil and Dry Sediment at the RVAAP-12 Load Line 12

Ravenna Army Ammunition Plant Ravenna, Ohio

GSA Contract No. GS-10F-0076J Delivery Order No. W912QR-05-F-0033

#### **Prepared for:**

U.S. Army Corps of Engineers 600 Martin Luther King, Jr. Place Louisville, Kentucky 40202

**Prepared by:** SAIC Engineering of Ohio, Inc. 8866 Commons Boulevard Twinsburg, Ohio 44087

July 13, 2009

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26

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1 2

## ACRONYMS AND ABBREVIATIONS

AOC	Area of Concern
BGS	Below Ground Surface
Camp Ravenna	Camp Ravenna Joint Military Training Center
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Chemical of Concern
CUG	Cleanup Goal
EPC	Exposure Point Concentration
FS	Feasibility Study
GIS	Geographic Information System
HHRA	Human Health Risk Assessment
IRP	Installation Restoration Program
LL12	Load Line 12
LUC	Land Use Control
MEC	Munitions and Explosives of Concern
MMRP	Military Munitions and Response Program
NGB	National Guard Bureau
NPDES	National Pollutant Discharge Elimination System
OHARNG	Ohio Army National Guard
Ohio EPA	Ohio Environmental Protection Agency
PMP	Property Management Plan
RAO	Remedial Action Objective
RD	Remedial Design
RI	Remedial Investigation
ROD	Record of Decision
RVAAP	Ravenna Army Ammunition Plant
U.S. Army	U.S. Department of Army
USACE	U.S. Army Corps of Engineers
UXO	Unexploded Ordnance

### 1 **1.0 BACKGROUND**

2 3

4

#### 1.1 GENERAL FACILITY DESCRIPTION

5 When the Ravenna Army Ammunition Plant (RVAAP) Installation Restoration Program (IRP) began 6 in 1989, the RVAAP was identified as a 21,419-acre installation. The property boundary was 7 resurveyed by the Ohio Army National Guard (OHARNG) over a two year period (2002 and 2003) 8 and the actual total acreage of the property was found to be 21,683.289 acres. As of February 2006, a 9 total of 20,403 acres of the former 21,683-acre RVAAP have been transferred to the National Guard 10 Bureau (NGB) and subsequently licensed to the OHARNG for use as a military training site – Camp 11 Ravenna Joint Military Training Center (Camp Ravenna). The current RVAAP consists of 1,280 12 acres in various parcels throughout the OHARNG Camp Ravenna.

13

14 Camp Ravenna is in northeastern Ohio within Portage County and Trumbull County, approximately 3 15 miles (4.8 km) east-northeast of the city of Ravenna and approximately 1 mile (1.6 km) northwest of the city of Newton Falls. The RVAAP portions of the property are solely located within Portage 16 17 County. Camp Ravenna is a parcel of property approximately 11 miles (17.7 km) long and 3.5 miles 18 (5.6 km) wide bounded by State Route 5, the Michael J. Kirwan Reservoir, and the CSX System 19 Railroad on the south; Garret, McCormick, and Berry roads on the west; the Norfolk Southern 20 Railroad on the north; and State Route 534 on the east (see Figures 1-1 and 1-2). Camp Ravenna is 21 surrounded by several communities: Windham on the north; Garrettsville 6 miles (9.6 km) to the 22 northwest; Newton Falls 1 mile (1.6 km) to the southeast; Charlestown to the southwest; and 23 Wayland 3 miles (4.8 km) to the south.

24

The entire 21,683-acre parcel was an industrial facility that was government-owned and contractoroperated when the RVAAP was operational (Camp Ravenna did not exist at that time). The RVAAP IRP encompasses investigation and cleanup of past activities over the entire 21,683 acres of the former RVAAP; therefore, references to the RVAAP in this document indicate the historical extent of the RVAAP, which is inclusive of the combined acreages of the current Camp Ravenna and RVAAP, unless otherwise specifically stated.

31

Camp Ravenna is used for training and related activities; including field operations and bivouac training, convoy training, equipment maintenance, and storage of heavy equipment. Approximately 1,280 acres of property remain under the control of RVAAP; this acreage includes areas of concern (AOCs) and active mission areas. As AOCs are remediated, transfer of the remaining acreage will occur for the purposes of the Camp Ravenna mission. Future uses of the land at RVAAP include mounted and dismounted maneuver training areas, development of ranges, as well as the construction of additional field support and cantonment facilities to support future training.

### 1 **1.2 LOAD LINE 12 DESCRIPTION**

2

3 Load Line 12 (LL12), designated as AOC RVAAP-12, covers about 80 acres in the southeastern 4 portion of RVAAP (Figures 1-2 and 1-3). LL12 was originally known as the Ammonium Nitrate Plant and started operations on November 25, 1941. Structures related to the production of the 5 6 ammonium nitrate were the Neutral Liquor Building (Building FF-19) and seven 7 evaporation/crystallization units (Buildings 900, 901, 902, 903, 904, 905, and 906). Other structures, 8 such as Water Works No. 2 and Power House No. 3 (Building FE-17), housed support operations. 9 The western half of the AOC contained former production areas. The eastern half was previously 10 cleared, but did not contain any known production facilities. The Remedial Investigations (RIs) also 11 identified an area immediately north of the AOC (informally termed the Team Track Area) that was 12 apparently used for offloading and staging of materials used in LL12 production activities.

13

In May 1943, production of ammonium nitrate was terminated. From 1946 to 1950, a private contractor leased LL12 to produce fertilizer-grade ammonium nitrate. From 1965 to 1967, a private contractor leased Building FF-19 for the production of aluminum chloride. The U.S. Department of Army (U.S. Army) terminated the lease early due to environmental concerns related to air emissions and wastewater discharges to Cobbs Ponds.

19

In June 1944, Buildings 900, 904, and 905 were converted for demilitarization of munitions. Rinsate from demilitarization operations was initially allowed to flow out of the buildings and directly onto the ground or to drainage ditches. In 1981, the LL12 Pink Water Treatment Plant was built to treat the demilitarization effluent prior to discharge. After the termination of demilitarization operations, the treatment plant was used under a National Pollutant Discharge Elimination System (NPDES) permit to treat explosives-tainted stormwater from LL12 and other RVAAP locations.

26

Currently, there are no above-grade structures remaining at the AOC. Demolition of Buildings 901, 902, 906, and FF-19 took place between 1973 and 1975. Building FN-54 (bagging and shipping facility) was demolished in the 1980s. In 1999, approximately 1,500 ft³ of soil was removed from four pits near Building 904 and taken to a former warehouse at Load Line 4 as part of an explosives composting pilot study. Demolition of all remaining structures took place between 1998 and 2000. A former blast berm near Building 903 was removed and used as fill/groundcover for areas around Buildings 903 and FE-17.

34

35 The following investigations have been completed for LL12:

- 36
- 37 38

• Preliminary Assessment for the Characterization of Areas of Contaminations at the Ravenna Army Ammunition Plant, Ravenna, Ohio (USACE 1996);

Phase I Remedial Investigation Report for the Phase I Remedial Investigation of High
 Priority Areas of Concern at the Ravenna Army Ammunition Plant, Ravenna Ohio (USACE
 1998);

1 2	• Phase II Remedial Investigation Report for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio (USACE 2004);
3 4	• Characterization of 14 Areas of Concern at the Ravenna Army Ammunition Plant Ravenna, Ohio (MKM 2007); and
5 6	• Phase II Remedial Investigation Supplemental Report for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio (USACE 2005a).
7 8 9 10	The U.S. Army intends to transfer LL12 to NGB following the remediation of contaminated soil/dry sediment. OHARNG plans to use LL12 for National Guard training. Specifically, the AOC will be used for mounted training, which includes operation of wheeled and tracked vehicles.
11 12 13 14 15 16 17 18 19 20	An evaluation of alternatives was conducted to select remedies for shallow soil and dry sediment. Dry sediment refers to unconsolidated inorganic and organic material on the surface of the ground that occasionally may be covered with water, usually following a precipitation event. Dry sediments are not covered with water for extended periods and typically dry within seven days. Dry sediments do not function as permanent habitat for aquatic organisms, although they may serve as a natural medium for the growth of terrestrial organisms. Dry sediment is essentially soil that, due to its location, may be covered with water occasionally. The term soil used throughout this Land Use Control (LUC) Remedial Design (RD) refers to soil and accumulated dry sediment. The evaluation of the alternatives is documented in the <i>Feasibility Study for Load Line 12 (USACE 2006)</i> .
21 22 23 24 25	The Site Inspection Report (E2M 2008) for the Military Munitions Response Program (MMRP) at RVAAP recommended no further action for LL12 with respect to unexploded ordnance (UXO) and munitions and explosives of concern (MEC). However, MEC survey and clearance procedures will be implemented during excavation activities as additional safety precautions.
26 27 28 29	The selected remedy for chemically contaminated soil consists of excavation and disposal of contaminated soil identified within the Main Ditch at LL12. The selected alternative includes the following:
30 31 32	<ul> <li>Clearing of vegetation;</li> <li>Excavation of contaminated soil above clean up goals (CUGs) to a depth of 4 ft below ground surface (BGS);</li> </ul>
33 34	• Handling and disposal of contaminated soil (above remedial goals) at an approved off-site facility;
35	• Confirmatory sampling after excavation;
36 37	• Restoration of excavated areas by backfilling with clean fill material per the <i>Facility-Wide Sampling and Analysis Plan for Environmental Investigations at the RVAAP</i> (USACE 2001);

1 Implementation of LUCs (e.g., security procedures, installation perimeter fencing, markers, • 2 and operational administrative controls) at LL12; and 3 Conducting 5-year reviews and monitoring of the performance of the selected remedy (i.e., 4 monitoring of the LUC effectiveness) as described in the LL12 Record of Decision (ROD) 5 (USACE 2009). 6 7 In addition, the selected alternative includes inspection and maintenance of the RVAAP/Camp 8 Ravenna perimeter fence. 9 10 **1.3 PURPOSE** 11 12 The purpose of this LUC RD is to outline a process for the implementation and maintenance of LUCs 13 as part of the remedial action at LL12. This LUC RD provides LUC performance objectives, the 14 LUCs to be used, and the LUC implementation actions. 15 16 1.4 EXPOSURE ASSUMPTIONS AND ANTICIPATED LAND USE 17 18 This baseline human health risk assessment (HHRA) summary documents the potential health risks to 19 humans resulting from exposure to contamination within LL12 at RVAAP if no remedial action was 20 taken. It provides the basis for taking action and identifies the contaminants and exposure pathways 21 that need to be addressed by the remedial action. Section G.1 of the ROD summarizes the results of 22 the baseline risk assessment presented in the Feasibility Study (FS) for LL12 at RVAAP (USACE 23 2006). 24 25 The RVAAP will be retained by the U.S. government (i.e., a federal facility) for use by the OHARNG 26 for military training. The HHRA identified the National Guard Trainee as the representative receptor 27 for the reasonably anticipated future land use. Three other receptors (Security Guard/Maintenance 28 Worker, Fire/Dust Suppression Worker, and Hunter/Trapper) were also considered under the planned 29 OHARNG future use. The National Guard Trainee is the most sensitive receptor under planned future 30 land use. Potential exposures for the remaining three receptors are less than the National Guard 31 Trainee and clean-up goals for the National Guard Trainee are also protective for these other 32 receptors. The Resident Subsistence Farmer (adult and child) provided a full comparative range of 33 risks for development and analysis of remedial alternatives. Risk information for other receptors is 34 located in the HHRA (USACE 2005b) and FS (USACE 2006). 35 36 The intended future land use for LL12 is for National Guard training. Specifically, this area will be 37 used for mounted training. Maneuver damage may occur up to 4 ft BGS. This future use is inclusive 38 of these receptor types: Trainee, Security Guard/Maintenance Worker, Hunter/Trapper, and Fire/Dust 39 Suppression Worker.

### 1 1.5 SUMMARY OF RISKS NECESSITATING LAND USE CONTROLS

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4

5

6 7 A HHRA evaluated potential risks from current and predicted future exposures to soil and dry sediment contaminants at LL12 (USACE 2005b). Currently, installation personnel visit the AOC infrequently to conduct power line maintenance, perform timber harvesting, and check the status of beaver dams. OHARNG plans to use LL12 for National Guard mounted training. The HHRA evaluated the Security Guard/Maintenance Worker, Hunter/Trapper, Child Trespasser, National Guard Trainee, Open Recreator, Open Industrial Worker, and Resident Farmer (adult and child) as

- 8 Guard Trainee, Open Recreator, Open Industrial Worker, and Res
  9 receptors to address a range of possible future land uses.
- 10

11 Nine soil and three dry sediment chemicals of concern (COCs) were identified for the National Guard 12 Trainee in the HHRA for LL12 (USACE 2005b). All of these COCs, except arsenic, were eliminated 13 from further consideration because the corresponding exposure point concentrations (EPCs) did not 14 exceed the clean-up goals. Also, the distribution of COCs in soil was limited to isolated occurrences 15 (e.g., no definite areas of contamination).

16

17 The remedial action objective (RAO) references clean-up goals and target risk levels that are 18 considered protective of human health under current and reasonably anticipated future use scenarios. 19 The RAO for this remedy is to prevent National Guard Trainee exposure to contaminants in soil and 20 dry sediment that exceed the clean-up goals to a depth of 4 ft BGS. Soil and dry sediment 21 contamination will be remediated to a maximum depth of 4 ft BGS because future land use will not 22 require disturbance of soil below that depth. The clean-up goals are presented in Section H, Table 2 23 of the ROD.

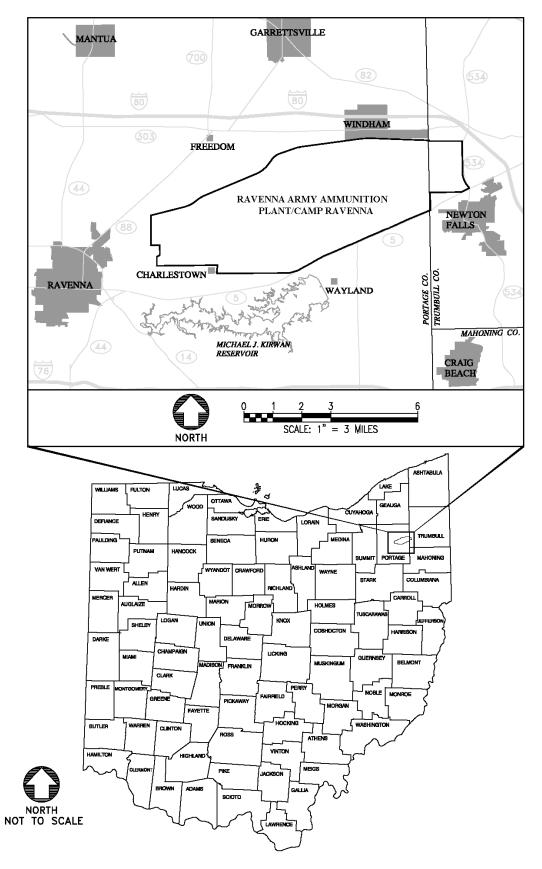


Figure 1-1. General Location and Orientation of the RVAAP/ Camp Ravenna



Figure 1-2. RVAAP/ Camp Ravenna Installation Map

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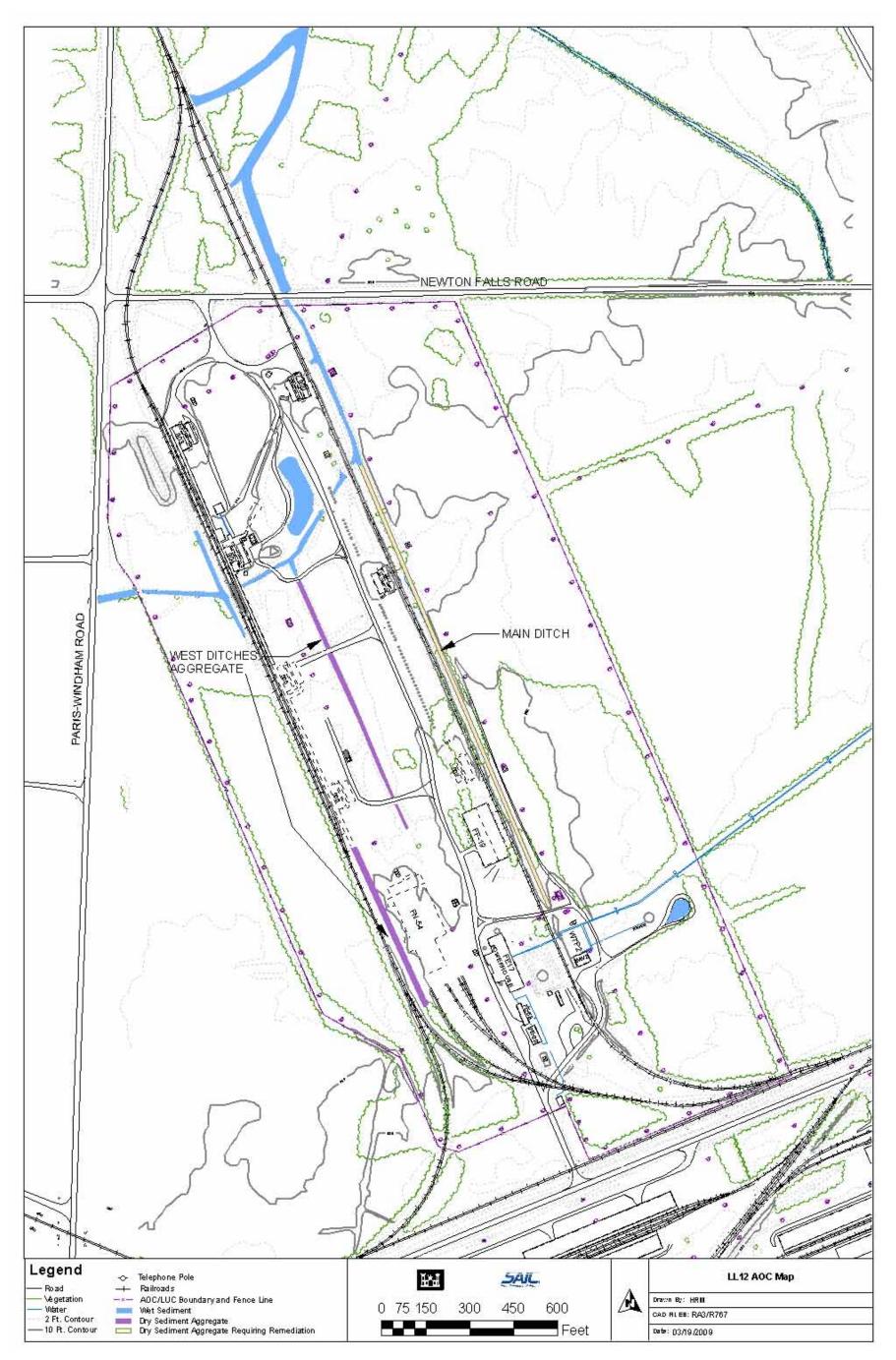


Figure 1-3. Load Line 12 Area of Concern Map

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# 1 2.0 LAND USE CONTROL OBJECT

2	
3	The U.S. Army will implement LUCs to achieve the performance objectives listed below for LL12.
4	
5	1.) Maintain the Camp Ravenna perimeter fence.
6	2.) Restrict future land use to National Guard mounted training.
7	3.) Maintain LUC training program.
8	4.) Limit activities to tracked and wheeled operations that are consistent National Guard
9	mounted training scenario and other essential security, safety, and natural resources
10	management activities.
11	5.) Prohibit digging beyond 4 ft BGS at LL12.
12	
13	Figures 1-2 and 1-3 depict the LUC boundaries for LL12.

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### 1 3.0 LAND USE CONTROLS

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3 This section provides a description of the LUCs, the logic for their selection, and implementation 4 actions. The U.S. Army or its representatives are responsible for implementation, inspection, periodic 5 reporting, and enforcement of the LUCs for LL12. As a condition of property transfer or lease, the 6 U.S. Army may require the transferee or lessee, with approval from the Ohio Environmental 7 Protection Agency (Ohio EPA), to assume responsibility for various implementation actions as 8 indicated below. Third party LUC responsibility will be incorporated into pertinent contractual and 9 property documentation, such as a purchase agreement, deed, lease, and an Ohio Environmental 10 Covenant. Although the U.S. Army may transfer primary responsibility for various implementation 11 actions to a third party, the U.S. Army shall remain ultimately responsible for remedy integrity. This 12 means that the U.S. Army remains responsible for addressing violations of LUCs. Should any LUC 13 be violated, the U.S. Army will ensure that appropriate actions are taken as soon as practicable to 14 terminate the offending land use and may initiate legal action to either compel action by a third 15 party(ies) and/or to recover the U.S. Army's costs for remedying any discovered LUC violation(s).

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### 3.1 LAND RESTRICTIONS AT LOAD LINE 12

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Land use of LL12 shall be limited by the maintenance of the existing Camp Ravenna perimeter fence,
which shall be a 6-foot chain-link fence topped with a v-shaped bracket slanting inward and outward
with a three-strand barbed wire bracket.

22

23 Land use shall be limited to use of LL12 for National Guard mounted training operations. Activities 24 at LL12 shall be limited to the following: tracked and wheeled vehicle operations and associated 25 training activities along with training area development and maintenance, maintaining the integrity of 26 monitoring wells, road and culvert repair, routine ditch maintenance, vegetation management 27 [mowing, brush and weed cutting, controlled burning, and herbicide application]); and compatible 28 natural resources management activities (including but not limited to such activities as flora and fauna 29 surveys, timber management to include timber stand improvement and forest products harvesting, soil 30 stabilization and erosion control, invasive/non-native species control, nuisance wildlife control, 31 drainage maintenance, wetland delineations, grassland management, and scientific research).

32

Duration of exposure shall be based upon the established National Guard Trainee exposure scenario cited per person at 39 days per year at 24 hour per day for a maximum of 25 years (USACE 2005b). All activities must be in compliance with established digging restrictions and established exposure limits. All other uses of LL12 are prohibited, and the U.S. Army will cause appropriate notice to be posted.

### 1 **3.2 DISTURBANCE RESTRICTIONS**

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All digging or excavation on LL12 to depths more than 4 ft BGS is prohibited with the exceptions:

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1.) Ground surface repairs, as required, resulting from maneuver damage.

2.) Routine maintenance of the roads, ditches and culverts.

- 2 3 The U.S. Army shall perform the following implementation actions to ensure that the LUC objectives 4 are met: 5 6 • Prepare geographic information system (GIS) data and a map indicating the location and dimensions of the AOC with the LUC location. Signage/markers will be placed in locations 7 8 to identify the areas where the LUC applies. 9 • Incorporate environmental overlay and appropriate Ohio EPA notice procedures into the 10 Property Management Plan (PMP). 11 Through the PMP, prohibit digging or excavation activities beyond 4 ft BGS, except for: • routine maintenance of roads, ditches and culverts, and ground surface repairs resulting from 12 13 maneuvering damage. 14 • Through the PMP, maintain the Camp Ravenna perimeter fence and limit activities at LL12 15 to tracked and wheeled operations that are consistent with the National Guard mounted training scenario and other essential security, safety, and natural resource management 16 17 activities. 18 If additional LUC-related RD documents are identified or prepared for proposed inclusion in the 19 LL12 RD, the U.S. Army shall, upon review and approval by Ohio EPA, incorporate those documents
- 20 as appropriate into the PMP, and provide copies to Ohio EPA.

4.0 IMPLEMENTATION ACTIONS

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## **5.0 MODIFICATION OR TERMINATION OF LUCS**

3 LUCs concerning disturbance of soil on LL12 are expected to remain in place indefinitely. LUCs 4 concerning restriction to National Guard mounted training use are expected to remain in place 5 indefinitely unless further action is taken to reduce the concentrations of hazardous substances in soil 6 to levels that allow for unlimited use and unrestricted exposure.

8 The U.S. Army shall not, without Ohio EPA approval, make a modification to any LUC. The U.S. 9 Army shall not, without Ohio EPA approval, make a land use change inconsistent with the LL12 10 ROD or this LUC RD. Likewise, the U.S. Army shall seek prior Ohio EPA approval before 11 commencing actions that may impact remedy integrity.

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13 The U.S. Army shall not, without Ohio EPA approval, terminate a LUC. The decision to terminate

- 14 LUCs will be documented consistent with the National Oil and Hazardous Substances Pollution
- 15 Contingency Plan process for post-ROD changes.

### 1 6.0 MONITORING AND REPORTING

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Periodic monitoring of LUCs in the form of site inspections will be conducted by the U.S. Army to confirm whether the LUCs remain effective and meet LUC objectives for continued remedy protectiveness. Site inspections will be conducted as necessary, but not less than once per year. Monitoring results will be reported in an annual LUC monitoring report, with changes in monitoring frequency to be coordinated with and approved by Ohio EPA. The U.S. Army will provide (via mail) each report to Ohio EPA.

9

The annual LUC monitoring report will evaluate the status and effectiveness of LUCs with a description of how any LUC deficiencies or inconsistent uses were addressed. The annual LUC monitoring reports will be used in the preparation of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 121(c) Five-Year Review. As part of the LUC monitoring report, a written certification will be submitted stating whether or not the LUCs remain in

15 place and are effective.

# 1 7.0 CERCLA 121(C) FIVE-YEAR REVIEWS

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As part of the CERCLA Section 121(c) 5-Year remedy review process, the U.S. Army shall prepare a

- 4 report evaluating the continued effectiveness of the remedy, including effectiveness of the LUCs and
- 5 an assessment of whether there is a need to modify the LUCs. The U.S. Army will verify whether the
- 6 LUCs continue to be properly documented and maintained. Each remedy review will evaluate
- 7 whether conditions have changed due to contaminant attenuation, migration or other factors such as
- 8 land use. If risk levels have changed since initial LUC implementation, LUC modification will be
- 9 considered, which may include a change in monitoring frequency.

#### **8.0 LUC ENFORCEMENT** 1

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3 If the U.S. Army discovers any land use that is inconsistent with the LUCs or LUC objectives, or that impairs the effectiveness of the remedial actions at LL12, the U.S. Army will notify Ohio EPA in 4 writing as soon as practicable but no later than ten (10) days after discovery, and will include a 5 6 written description of the inconsistent land use. Within ten (10) days after such notification, the U.S. 7 Army will provide Ohio EPA with information regarding what efforts or measures have or will be 8 taken to address the inconsistent land use. 9 10 The U.S. Army will work with Ohio EPA and if applicable, transferees/lessees of LL12 or any

11 portion thereof, to take appropriate action to enforce the LUCs or maintain remedy integrity. The 12 U.S. Army may take immediate action pursuant to its CERCLA authorities to prevent any perceived 13 risk(s) to human health or the environment. Any breach of the LUCs will be reported to the 14 appropriate civil authorities. Potential response measures include informal resolution with the owner

15 or violator, and the institution of judicial action under State property law or CERCLA.

### **9.0 LEASES AND PROPERTY TRANSFERS**

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No later than sixty (60) days prior to leasing or transferring any portion of LL12 to another agency, person, or entity (including federal to federal transfers), the U.S. Army shall provide written notice to Ohio EPA of such intended lease or transfer. The notice shall identify the proposed lessee or transferee and describe any additional mechanism(s) to be used for future LUC responsibilities after lease or transfer.

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9 As a condition of a lease, the U.S. Army will require that equivalent LUCs will be put into the terms
10 and conditions of the lease. The lease will prohibit the lessee from modification or termination of any
11 restrictions/ LUCs without prior U.S. Army concurrence and Ohio EPA approval.

12

As a condition of a transfer to another federal entity, the U.S. Army will require that equivalent LUCs will be put into the terms and conditions of the transfer document. The transfer document will prohibit the transferee and subsequent owners or users from modification or termination of the LUCs without prior U.S. Army concurrence and Ohio EPA approval. The U.S. Army will consult with Ohio EPA for input on the deed or transfer document language.

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Furthermore, the transferee or lessee will be responsible for ensuring compliance with the LUCs.
However, the U.S. Army remains responsible for implementing, maintaining and monitoring the
remedial actions (including LUCs) before and after property lease or transfer.

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23 In addition, concurrent with the lease or transfer of LL12 or any portion thereof from the U.S. Army, 24 information regarding the LUCs will be communicated in writing to the lessees or transferees and to 25 appropriate state and local agencies to ensure such agencies can factor such conditions into their 26 oversight and decision-making activities regarding the property. Should a problem with LUC 27 implementation, maintenance, monitoring, reporting or enforcement arise at a transferred or leased 28 property, the U.S. Army will work together with the transferee or lessee, and subsequent property 29 owner(s) and user(s), as well as Ohio EPA and appropriate local government representatives, to 30 resolve any LUC problems and to ensure expedient solutions.

31

If the U.S. Army intends to convey ownership of LL12 or any portion thereof to a non-federal entity, the U.S. Army will require that, following review and approval by Ohio EPA, the transferee execute and record an environmental covenant, in accordance with and pursuant to Ohio Revised Code §§ 5301.80 to 5301.92 that establishes the LUCs as enforceable activity and use limitations under state law.

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38 If the U.S. Army becomes aware of an action that interferes with or violates an Environmental 39 Covenant, it will take action to resolve the matter in accordance with the enforcement procedures set 40 forth in the Environmental Covenant. The U.S. Army will notify Ohio EPA within three (3) days of 41 becoming aware of the violation. If the matter is not resolved, the U.S. Army will notify Ohio EPA 42 of the results of its resolution efforts (e.g., any corrective action) or proposal to resolve the matter 43 within ten (10) days of discovery of the violation.

### 1 10.0 RESPONSIBILITIES OF SUBSEQUENT OWNERS/ LESSEES

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3 In the event of property transfer or lease, the U.S. Army may require the transferee or lessee and 4 subsequent property owner(s) and user(s) to assume certain responsibilities for LUC implementation 5 actions described above, including maintenance, inspection, reporting and enforcement, with the 6 involvement of the appropriate state and/or local government representatives. The responsibilities 7 assumed by transferee(s) and subsequent owner(s) and user(s) shall be clearly documented in the 8 appropriate transfer/ lease documentation. The U.S. Army will continue to: (1) conduct all CERCLA 9 121(c) reviews; (2) notify the appropriate state and/or local government representatives of any known 10 LUC deficiencies or violations; (3) reserve the right to access the property to conduct any necessary 11 response; (4) reserve the authority to change, modify or terminate LUCs and any related deed or lease 12 provisions, with Ohio EPA approval; and, (5) remain responsible for remedy integrity. To the extent 13 permitted by law, a transfer deed shall require the LUCs imposed as part of a CERCLA remedy to run 14 with the land and bind all property owners and users to enforcement by the U.S. Army. 15

16 The transferee or lessee, as well as subsequent property owner(s) and user(s), will be responsible for 17 promptly notifying the U.S. Army, Ohio EPA, and local government representatives, of any 18 deficiencies or violations of LUCs and what efforts or measures have or will be taken to address the 19 deficiency within a reasonable time. Any violations of federal, state or local law will be reported to 20 the appropriate law enforcement authorities. If the transferee or lessee wants to (1) conduct 21 additional remediation, (2) change land use inconsistent with a deed or lease restriction, or (3) modify 22 or terminate a LUC, the transferee or lessee must first obtain written approval from the U.S. Army 23 and Ohio EPA and the property owner.

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