

APPENDIX H

**CORRESPONDENCE &
COMMENT/RESPONSE TABLES**



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 16, 2009

Mr. Mark Patterson
Installation Manager
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, OH 44266

RE: RAVENNA ARMY AMMUNITION PLANT,
PORTAGE/TRUMBULL COUNTIES,
DRAFT, FWGWMP, JANUARY 2009
SAMPLING EVENT REPORT,
RESPONSE TO OHIO EPA COMMENTS
DATED JULY 1, 2009

CERTIFIED MAIL
7008 3230 0003 5419 7914

Dear Mr. Patterson:

The Ohio Environmental Protection Agency (Ohio EPA) has received and reviewed the "Response to Ohio EPA Comments, Facility-Wide Ground Water Monitoring Program (FWGWMP) Draft January 2009 Sampling Event" document. The "Investigative Derived Waste and Characterization and Disposal Plan" (IDW) has been included in Appendix F in this document. The document was received at Ohio EPA, Northeast District Office (NEDO), Division of Emergency and Remedial Response (DERR), on July 2, 2009. The document was prepared for the U.S. Army Corps of Engineers (USACE) – Louisville District, by Environmental Quality Management, Inc. (EQM), under contract no. W912QR-04-D-0036.

The IDW plan, Appendix F, was previously approved. The remaining comments have been adequately addressed and the report is approved. Please forward one copy of the replacement pages and titles.

If you have any questions, please call me at (330) 963-1207.

Sincerely,

Vicki Deppisch
Project Coordinator
Division of Emergency and Remedial Response

VD/kss

cc: Bonnie Buthker, Ohio EPA, DERR, SWDO
Katie Elgin, OHARNG RTLS
Glen Beckham, USACE Louisville
John Miller, EQM
Conni McCambridge, Ohio EPA, DERR, NEDO

Eileen Mohr, Ohio EPA, DERR, NEDO
Maj. Ed Meade, OHARNG RTLS
Mark Krivansky, AEC
Mark Nichter, USACE Louisville

ec: Mike Eberle, Ohio EPA, DERR, NEDO
Todd Fisher, Ohio EPA, DERR, NEDO



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June 18, 2009

RE: RAVENNA ARMY AMMUNITION PLANT,
PORTAGE/TRUMBULL COUNTIES,
FWGWMP, DRAFT, JANUARY 2009
SAMPLING EVENT REPORT

Mr. Mark Patterson
Installation Manager
Ravenna Army Ammunition Plant
8451 State Route 5
Ravenna, OH 44266

CERTIFIED MAIL
7008 2810 0000 5304 9814

Dear Mr. Patterson:

The Ohio Environmental Protection Agency (Ohio EPA) has received and reviewed the "Facility-Wide Ground Water Monitoring Program (FWGWMP) Draft January 2009 Sampling Event" document. The "Investigative Derived Waste and Characterization and Disposal Plan" (IDW) has been included as Appendix F. The document was received at Ohio EPA, Northeast District Office (NEDO), Division of Emergency and Remedial response (DERR), on May 13, 2009. The document was prepared for the U.S. Army Corps of Engineers (USACE) – Louisville District, by Environmental Quality Management, Inc. (EQM), under contract no. W912QR-04-D-0036. This document was reviewed by Ohio EPA personnel in NEDO, DERR, and NEDO's Division of Drinking and Ground Waters (DDAGW).

The IDW plan, Appendix F, was approved in a March 6, 2009 letter from Ohio EPA. Enclosed are Ohio EPA's comments that need to be addressed before the entire document can be approved.

The Director's Final Findings and Orders require that the responses to comments (RTCs) be received within fifteen (15) days of the Army's receipt of Ohio EPA's correspondence, and that the revised document be submitted within thirty (30) days of the Army's receipt of Agency correspondence.

If you have any questions, please call me at (330) 963-1207.

Sincerely,

Vicki Deppisch, Project Coordinator
Division of Emergency and Remedial Response

VD/kss

enclosure

cc: Bonnie Buthker, Ohio EPA, DERR, SWDO
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ec: Mike Eberle, Ohio EPA, DERR, NEDO

Todd Fisher, Ohio EPA, DERR, NEDO

PRELIMINARY DRAFT FACILITY-WIDE GROUNDWATER MONITORING PROGRAM
 (REPORT ON THE JANUARY 2009 SAMPLING EVENT)
 RAVENNA ARMY AMMUNITION PLANT, RAVENNA OHIO
 COMMENT RESPONSE TABLE
 JUNE 18, 2009

Comment Number	Page or Sheet	New Page or Sheet	Comment	Recommendation	Response
Ohio EPA (V. Deppisch/C. McCambridge)					
O-1	Page 114/Line 27 (Section 3.1.1, Tables 3-1 and 3-2)		<p>Table 3-1 indicates that many wells have total sediment accumulations of greater than 1 foot (or greater than 10% of the 10-ft screen length, 10 feet). Even though low-flow purging and sampling techniques were used, these sediment accumulations could be indicative of excessive silting in these wells (FWGWMPP, Section 4.1, pg. 4-1)</p> <p>Table 3-2 lists seventeen (17) wells that will be redeveloped in 2009.</p>	<p>The issue of excessive silting in these wells should be addressed. Please provide a brief time schedule as when the wells listed in table 3-2 will be redeveloped in 2009. Please also clarify what redevelopment activities will be conducted in these wells prior to the next sampling event.</p>	<p>The following text will be added to the second paragraph of Section 3.1.1:</p> <p><i>The wells identified in Table 3-2 will be redeveloped during the period of June 16-18, 2009. Redevelopment will be completed by surging and pumping using a surge block, and a centrifugal and/or submersible pump. This will be performed to remove fines accumulating as sediment in the bottom well cap. Each well will be developed by at least two methods (surge and pump) with the attempt to reach stability of hydraulic conditions according to the Technical Guidance Manual for Hydraulic Investigations and Groundwater Monitoring OEPA, February 1995.</i></p> <p>Note: At the time of the response to these comments the well redevelopment has been completed. The sediment levels will be rechecked during the July 2009 sampling event and the results of the redevelopment will be reported in the July 2009 groundwater report.</p>
O-2	Pages 43 to 65/(Section 3.2.2-Table 3-4)		<p>Table 3-3 contains several inorganic parameters that exceed their respective MCLs and/or Region 9 PRGs in various wells. The parameters are; aluminum, arsenic, cadmium, iron, and manganese.</p> <p>As this is a data report, there was no</p>	<p>These exceedances should be noted for further evaluation and discussion.</p>	<p>This comment pertains to potential remedial activities for groundwater at the facility. The following text will be inserted into Section 3.2.2:</p> <p><i>The facility-wide groundwater conditions are still being evaluated, including background levels for all inorganic compounds. This will</i></p>

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Ohio EPA (V. Deppisch/C. McCambridge)					
			<p>discussion what course of action will be taken to address the exceedances of the MCL and/r Region 9 PRG for the above mentioned inorganics in these wells..</p>		<p>also include an evaluation of aluminum, arsenic, cadmium, iron, and manganese related to exceedances of the MCLs. The elevated concentrations of the subject parameters will be evaluated with respect to Ravenna's Draft Facility-Wide Clean Up Goals (CUGs). If the parameters are identified as Contaminants of Concern (COCs), then a risk management analysis will be performed during the RI/FS process. Remedial actions will be implemented at the facility at any time the Groundwater COCs are deemed to represent an immediate threat to human health or the environment.</p>