J. Waston w/att.

J. Mound w/att.

J. McGee w/att. File w/att.

Autoron 346-3210



Telephone (216) 358-7111

May 17, 1989

THRU: Contracting Officer's Representative

Ravenna Army Ammunition Plant

8451 State Route 5

Ravenna, Ohio 44266-9297

TO:

Ohio Department of Commerce Division of State Fire Marshal

Bureau of Underground Storage Tank Regulations

ATTN: Todd Parfitt, Site Coordinator

7510 E. Main Street

P.O. Box 525

Reynoldsburg, Ohio 43068-3395

Subject: Ravenna Army Ammunition Plant, Building 1045 Underground Storage Tank

(UST) Release of No. 2 Fuel Oil From Attached Suction Line

Dear Mr. Parfitt:

This correspondence is in formal response to prescribed guidelines as delineated within OAC 1301:7-7-36 (C)(3) and (4) with regards to subject incident.

On 4/27/89, late afternoon, Mr. Kelly Gill of your division was notified by this installation's Fire Chief, Mr. John Watson, that a No. 2 F.O. pump at this facility's Bldg. 1045 was experiencing difficulty in maintaining suction during dispensing operations. Uncertainty to the cause of the malfunction was noted because of the possibility of failure of a foot valve within the tank, a defective pump, or suction line breach. All fuel pump dispensement ceased at that point till there was confirmation of the problem.

On 4/28/89, after further investigation which entailed pump inspection excavation, and low pressure hydrostatic testing it was found that the malfunction was attributed to an approximate 6 inch crack within the welded seam of the metal suction pipe. It was estimated that 5 gallons of fuel oil may have been lost through the cracked pipe. The release site made no evidence of free product liquid accumulation with minor soil contamination. Mr. Gill was immediately notified of the release and at the same time the suction line as well as the contaminated soil were removed from the excavation trench. The contaminated soil was sampled and placed under protective cover pending analytical results for determining final disposition. Further sampling of soil was taken to confirm excavation of the contaminated soil.

Upon the instructions of Mr. Gill, those soil samples designated as uncontaminated following removal of the contaminated soil were to be tested for benzene, Ethyl Benzene, Toluene and Xylene (BETX), total lead, and Total

Petroleum Hydrocarbons (TPH) as prescribed by USEPA Methods Manual SW-846 and USEPA publication 600/4-79-020. The contaminated soil was to be tested for PCB, EP toxicity (metals), percent solids, and flashpoint by prescribed methods as directed by Ohio EPA Solid Waste Division, Northeast District Office. Attachment #1 to this submittal reflects only a partial completion of analytical results indicative of the two soil samples. The soil sample identified within Attachment #1 as 1037A is the contaminated soil removed for which only PCB results are available and the soil sample identified as 1037B is uncontaminated soil for which only BETX and TPH are available for reporting at this time. The contracted lab was unable to provide the remaining data within the regulated 20 day reporting period. This installation requests a time extension for obtaining and submitting the remaining data to your agency.

On 5/11/89, R & R International, Inc. was brought on site to conduct soil core sampling of the affected site via the utilization of split-spoon methodology and Photoionization Device (PID) field screening. The boring was terminated at a 12 foot depth following "O" PID response of two consecutive measured boring extractions. Core samples from both the positive and negative PID response zones were obtained and forwarded onto a contracted laboratory for BETX, total lead, and TPH analyses. Formal report of the soil core sampling and analytical data has been promised a submittal date to Ravenna Army Ammunition Plant for 5/26/89. Again, this installation requests a time extension from your agency in order to obtain and submit this abovementioned data for response to the site investigation process.

In regards to repair work for returning the fuel dispensing station back into service, Ms. Kate Graff from your Tank Inspection Bureau has been contacted for the necessary permit applications and Ms. Barb Hess and Ms. Ginger Canankamp were contacted for the proper pipe installation criteria and required State inspection requirements. Fiberglass reinforced plastic pipe, couplings, and approved flexible tank and pump connections will be the replacement materials. The work will be performed by in-house qualified pipefitter personnel.

This installation's point of contact for further discussion of this subject matter will be Mr. Thomas M. Chanda, Environmental Engineer, Commercial phone 216-297-3221.

Sincerely,

RAVENNA ARSENAL, INC.

H. R. Cooper Plant Engineer

H. R. Cooper

HRC/TMC/wt/1tc89006

Attachment

cf: Commander
AMCCOM
AMSMC-ISE-M (Maj. Bobby Templin)
Rock Island, IL