#### **Final**

# Remedial Design for the RVAAP-12 Load Line 12

Ravenna Army Ammunition Plant Ravenna, Ohio

**October 1, 2009** 

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

# **Prepared for:**



United States Army Corps of Engineers Louisville District

Prepared by:



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#### CONTRACTOR STATEMENT OF INDEPENDENT TECHNICAL REVIEW

Science Applications International Corporation (SAIC) has completed the Final 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.

Tia Rutled of	30 Sep 09
Study/Design Team Leader	
Jalha	9/30/09
Jed Thomas, P.E. Independent Technical Review Team Leader	Date

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.

Scott Armstrong
Principal w/ A-E firm

Date

# Final 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

# Prepared by:

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October 1, 2009

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NGB = National Guard Bureau

Ohio EPA-NEDO = Ohio Environmental Protection Agency-Northeast District Office

Ohio EPA-SWDO = Ohio Environmental Protection Agency-Southwest District Office

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

USAEC = United States Army Environmental Command

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## ACRONYMS AND ABBREVIATIONS

AASHTO American Association of State Highway and Transportation Officials

A-E Architect-Engineer 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 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

CUG Cleanup Goal

DFFO Director's Final Findings and Orders

DoD U.S. Department of Defense

DOT U.S. Department of Transportation

EP Engineer Pamphlet

EPC Exposure Point Concentration

FD Field Duplicate
FS Feasibility Study
FSA Field Staging Area

FWSAP Facility-Wide Sampling and Analysis Plan 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

MRS Munitions Response Site
NCR Non-Conformance Report

NELAC National Environmental Laboratory Accreditation Conference

NFA No Further Action
NGB National Guard Bureau

# ACRONYMS AND ABBREVIATIONS (CONTINUED)

NOI Notice of Intent

NPDES National Pollutant Discharge Elimination System

NWP Nationwide Permit

OAC Ohio Administrative Code
OHARNG Ohio Army National Guard

Ohio EPA Ohio Environmental Protection Agency

OHPO Ohio Historic Preservation Office
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 Project 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

TAL Target Analyte List
TCL Target Compound List

TCLP Toxicity Characteristic Leaching Procedure

TSCA Toxic Substance Control Action
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 Ordnance
VOC Volatile Organic Compound

## 1.0 Introduction

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).

This work is being performed under a Performance-Based Contract (PBC) in accordance with U.S. General Services Administration (GSA) Environmental Advisory Services Contract GS-10-F-0076J. In addition, planning and performance of all work elements is being conducted in accordance with the requirements of the Ohio Environmental Protection Agency (Ohio EPA) Director's Final Findings and Orders (DFFO) dated June 10, 2004 (Ohio EPA 2004).

#### 1.1 PURPOSE

The purpose of this RD is to detail implementation of the selected remedial action alternative specified in 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). This Record of Decision (ROD) specifies what is required to be addressed to remove chemical contamination in soil and dry sediment at LL12 that exceed cleanup goals for the most reasonably anticipated land use (National Guard Trainee and the Resident Subsistence Farmer). Dry sediment at LL12 in the Main Ditch was the only area requiring remediation for soil and dry sediment at LL12 to achieve goals for the anticipated land use. Therefore, the media addressed throughout this RD will be referred to as dry sediment.

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

- Excavate contaminated dry sediment at LL12;
- Transport and dispose 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).

#### 1.2 SCOPE

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.

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

Area of Concern Volume Mass (cubic feet) (cubic yards) (tons)

706

1,130

Table 1-1. Estimated Removal Quantity for Dry Sediment

19,062

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

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 (FWSAP) (USACE 2001a), the Facility-Wide Safety and Health Plan (FWSHP) (USACE 2001b), and this RD.

#### 1.3 FACILITY DESCRIPTION

Load Line 12

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.

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 3 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 County. RVAAP/Camp Ravenna is a parcel of property approximately 11 miles (17.7 km) long and 3.5 miles (5.6 km) wide bounded by State Route 5, the Michael J. Kirwan Reservoir, and the CSX System Railroad on the south; Garret, McCormick, and Berry roads on the west; the Norfolk Southern Railroad on the north; and State Route 534 on the east (Figures 1-1 and 1-2). Camp Ravenna is surrounded by several communities: Windham on the north; Garrettsville 6 miles (9.6 km) to the northwest; Newton Falls 1 mile (1.6 km) to the southeast; Charlestown to the southwest; and Wayland 3 miles (4.8 km) to the south.

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.

#### 1.4 LOAD LINE 12 DESCRIPTION AND HISTORY

LL12 covers about 80 acres in the southeastern portion of RVAAP. Elevations across LL12 range from approximately 970 to 987 ft. Silty to clayey soil and glacial sediments overlie shale bedrock at LL12, except where disturbed by RVAAP activities. The 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). At LL12, the Main Ditch that bisects the central part of the AOC flows to the north, into drainage ditches north of the AOC. The Main Ditch is heavily wooded. A stream traverses LL12 from west to east and intercepts the Main Ditch near the northern boundary of the AOC. Ultimately the drainage flows into the Cobbs Pond complex (Upper/Lower Cobbs Pond) several hundred yards to the north of LL12. However, in recent years a beaver colony has constructed dams north of LL12. These structures have prevented surface water drainage from the AOC. As a result of these dams, stagnant water often resides within the Main Ditch and Active Area Channel. Site features are presented in Figure 1-3 of the RD.

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 LL12 contained former production areas. The eastern half was previously cleared, but did not contain any known production facilities. The Remedial Investigations (RIs) also identified an area immediately north of the LL12 (informally termed the Team Track Area) that was apparently used for offloading and staging of materials used in 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.

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.

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 cubic feet 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.

#### 1.5 ANTICIPATED FUTURE LAND USE

LL12 will be transferred 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.

# 1.6 PREVIOUS ACTIVITIES

#### 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).

#### 1.6.2 Phase I/Phase II Remedial Investigations

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 occurring in soil and dry sediment throughout the production area above risk-based screening values. The Phase II RI for LL12 (USACE 2006) characterized the nature and extent of contamination surface soil (0 to 1 ft BGS), subsurface soil (1 to 7 ft BGS), sediment, surface water, and groundwater, and assessed the potential risk to human health and the environment resulting from former operations at LL12. Arsenic was identified as a constituent of concern (COC) in dry sediment for the National Guard Trainee at LL12. Calculated risk from this metal is primarily associated with the very high dust loading factor and inhalation rate assumed for the National Guard Trainee.

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

## 1.6.3 Feasibility Study

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.

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

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

<sup>&</sup>lt;sup>a</sup>Sediment from the Main Ditch aggregate

COC = Constituent of Concern

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.

The recommended alternative for LL12, as presented in the FS, was Excavation of Dry Sediment with Offsite Disposal ~ National Guard Trainee Land Use. This alternative removes dry sediment from the Main Ditch at LL12 that exceeds preliminary cleanup goals for the anticipated future land use (National Guard Trainee). Figure 1-3 presents features of LL12, along with the FS modeled extents

<sup>&</sup>lt;sup>b</sup>Total 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.

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

# 1.6.4 Community Involvement and Regulatory Approval

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

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 3.0 of this RD) was achieved. The ROD includes a Responsiveness Summary addressing public comments received during the public comment period and public meeting.

#### 1.7 REMEDIAL DESIGN ORGANIZATION

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

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

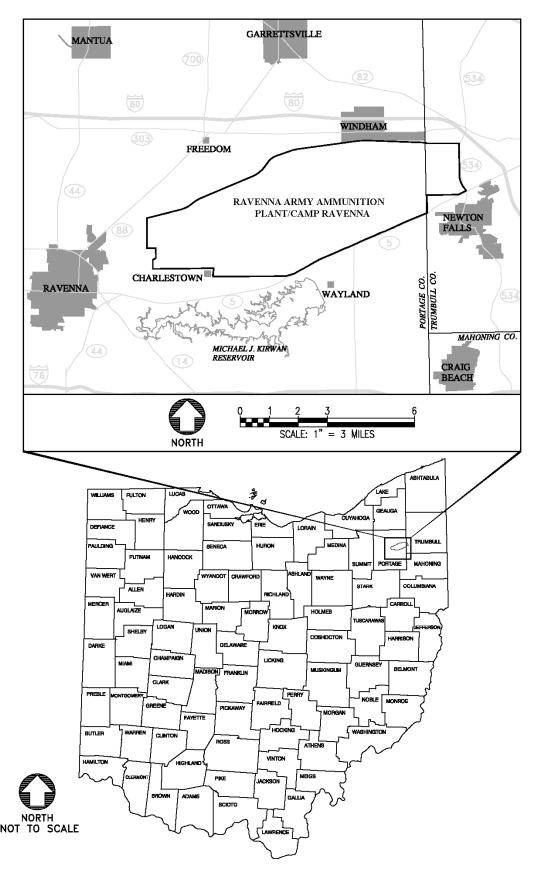
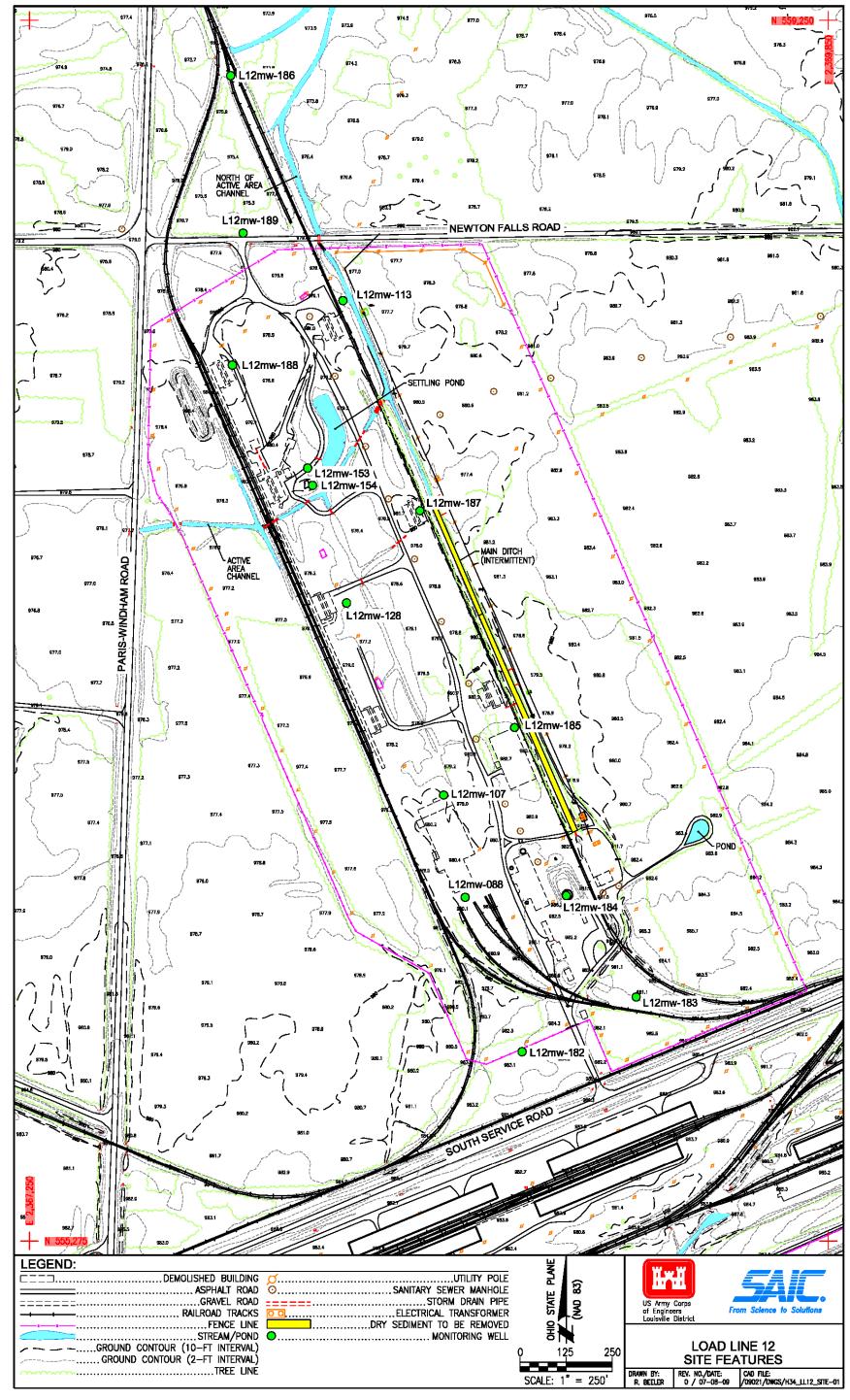


Figure 1-1. General Location and Orientation of RVAAP/Camp Ravenna

Figure 1-2. RVAAP/Camp Ravenna Installation Map



 $\ \, \textbf{Figure 1-3. Features of Load Line 12} \\$ 

## 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.

#### 2.1 PROJECT ORGANIZATION

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

#### 2.1.1 USACE Contracting Officer's Representative

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

#### 2.1.2 RVAAP Facility Manager

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

# 2.1.3 Ohio EPA Project Coordinator

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.

#### 2.1.4 SAIC Project Manager

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 the Ohio EPA Project Coordinator of any deviations to the project schedule. The Project Manager provides the Ohio EPA Project Coordinator: 1) notification of project

implementation; and 2) information regarding any quality assurance and non-conformance issues for this remedial action.

# 2.1.5 SAIC Technical Manager

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

#### 2.1.6 SAIC Quality Assurance/Quality Control Officer

The SAIC QA/QC Officer coordinates with the SAIC Construction Manager to ensure the requirements of the RD CQAP and Facility-Wide Quality Assurance Project Plan (QAPP), Part II of the FWSAP (USACE 2001a), are achieved and ensures inspections are performed in accordance with both plans.

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

#### 2.1.7 SAIC Health and Safety Manager

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 FWSHP (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.

#### 2.1.8 SAIC Construction Manager

The SAIC Construction Manager, also serving the role as appropriate to the Field Operations Manager as defined in Section 3.4 of the FWSAP (USACE 2001a), is responsible for 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.

## 2.1.9 Subcontractor Construction Manager

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

## 2.1.10 Subcontractor Site Safety and Health Officer

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

#### 2.1.11 MEC Avoidance Subcontractor

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

#### 2.2 MONTHLY REPORTS

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 reports will include a status and summary of project activities.

## 2.3 WEEKLY CONTRACTOR MEETING

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.

#### 2.4 BI-WEEKLY SCHEDULE CALLS

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.

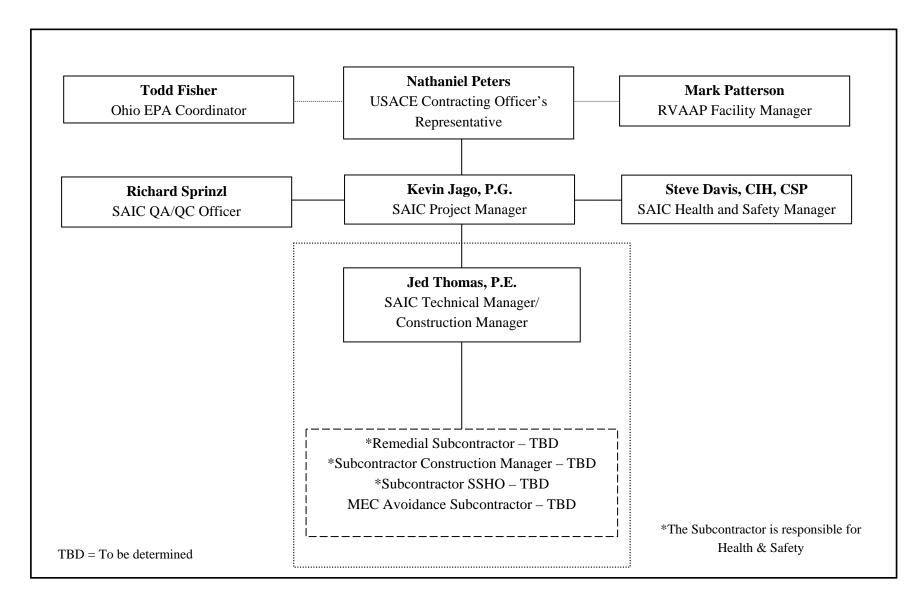


Figure 2-1. Organizational Chart for Implementation of the Remedial Design

## 3.0 REMEDIAL ACTION OBJECTIVES AND CLEANUP GOALS

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

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.

#### 3.2 REMEDIAL ACTION CLEANUP GOAL

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).

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

<sup>&</sup>lt;sup>a</sup>Dry sediment from the Main Ditch aggregate

COC = Constituent of Concern

EPC = Exposure Point Concentration

mg/kg = Milligrams per Kilogram

<sup>&</sup>lt;sup>b</sup>Total carcinogenic risk to a National Guard Trainee from contaminants in the Main Ditch was calculated as 1E-05.

## 4.0 DRY SEDIMENT CHARACTERIZATION SAMPLING

On May 4, 2009, SAIC conducted dry sediment characterization sampling within the Main Ditch at 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 were collected from each MI sample area for off-site laboratory analysis.

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 BGS for a sediment aggregate).

# **4.1.1** Multi-Increment Sampling for Characterization

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.

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 National Environmental Laboratory Accreditation Conference (NELAC) approved off-site laboratory. As part of the MI sample process, each MI sample was dried, sieved, finely ground by the off-site laboratory, and then analyzed for the specified constituent.

#### 4.1.2 Discrete Sampling for Characterization

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

#### 4.1.3 Characterization Sample Identification

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

				TCLP (SVOCs,	Reactive Cyanide,
Location	Sample ID	Arsenic, Total	TCLP <sup>a</sup> (VOCs)	Metals, Pest, Herb)	Sulfide, and 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

Table 4-1. Sample Identification for Waste Characterization Sampling

Additional parameters (e.g., paint filter test) may be required by the waste disposal facility. The waste disposal facility has not been selected at the time of this design.

1

0

0

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

L12sd-259-0912-SD

L12 = Load Line 12

Herb = Herbicides

L12-259M

MI = Multi-Increment

PCB = Polychlorinated Biphenyl

Pest = Pesticides

SVOC = Semi-Volatile Organic Compound

TCLP = Toxicity Characteristic Leaching Procedure

VOC = Volatile Organic Compound

<sup>&</sup>lt;sup>a</sup> Samples analyzed for VOCs will be collected as a discrete sample and will not undergo laboratory MI Processing (particle size reduction).

#### 4.2 CHARACTERIZATION SAMPLING RESULTS AND CONCLUSIONS

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 for classification purposes. A summary of the waste characterization data is below.

- 1.) All TCLP metals, VOCs, SVOCs, herbicides, cyanide, and sulfides were either nondetectable, or below the reporting limits.
- 2.) PCB concentrations were nondetectable with the exception of Aroclor 1254. The detected concentrations of Aroclor-1254 had a range of 0.042 0.270 mg/kg, which is below the Toxic Substance Control Action (TSCA) level of 25-50 mg/kg that would require reclassification of the waste.
- 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.

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.

**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.

CUG = Cleanup Goal

L12 = Load Line 12

Below is a summary of these sampling results.

- 1.) 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).
- 2.) The northernmost MI area (L12-259M) had an arsenic result below the cleanup goal. This is also the furthest downstream location of the Main Ditch.

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

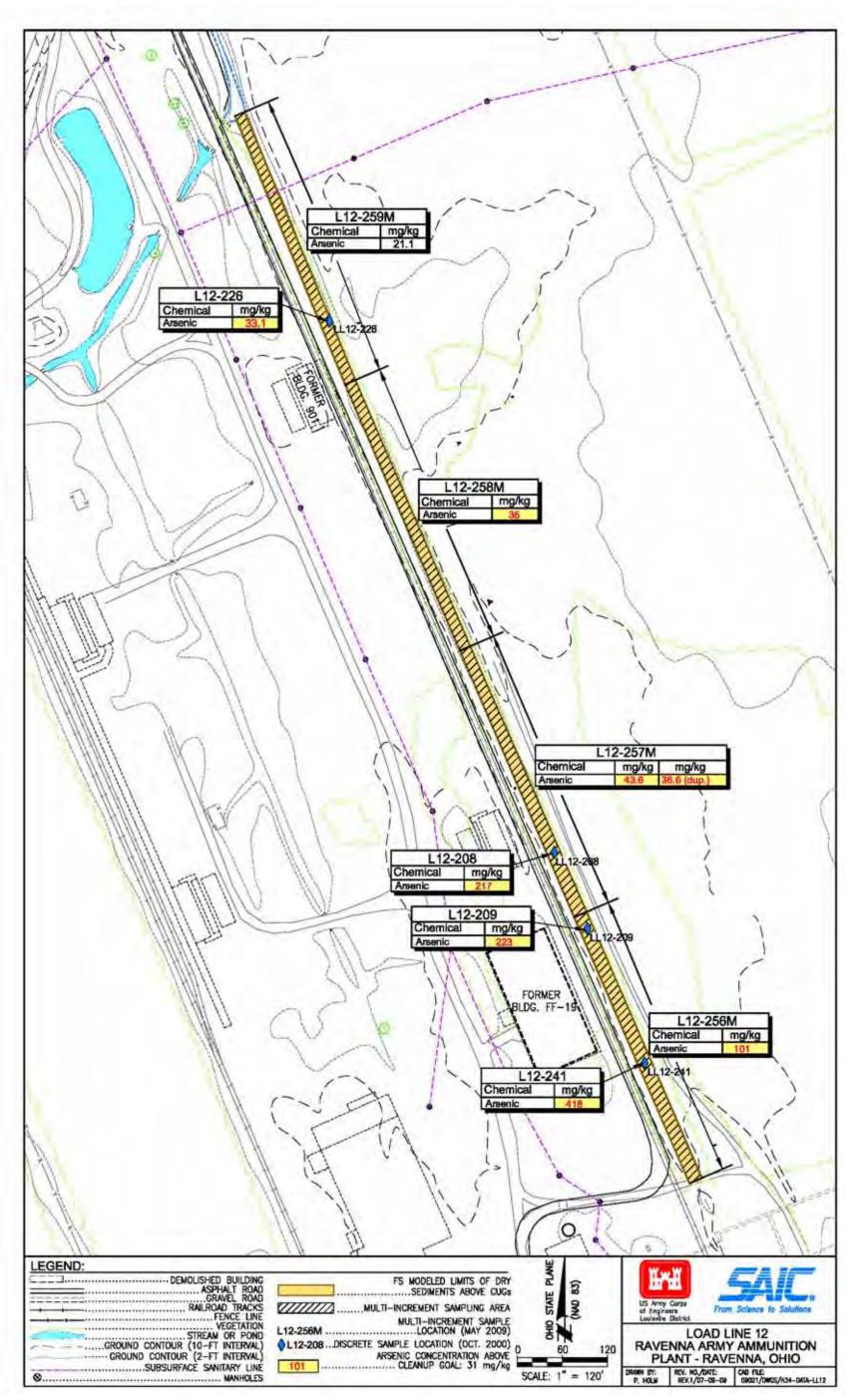


Figure 4-1. Load Line 12 Characterization Sample Locations and Results

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# 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.

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 RVAAP Administrative Record.

# 5.1 PERMIT AND NOTIFICATION REQUIREMENTS

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

- 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.

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.

# **5.1.1** Endangered Species Protection

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.

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

# **5.1.2** Protection of Historic Properties

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.

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.

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.

# **5.1.3** Ohio EPA Requirements

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.

USACE/SAIC will notify Ohio EPA of the following:

- 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).

## **5.1.4** Wetland Permit Requirements

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 Ohio Rapid Assessment Method (ORAM) palustrine emergent wetland. This report was submitted to the USACE - Pittsburgh District for Jurisdictional Determination.

USACE-Pittsburgh District determined the wetland within the Main Ditch is jurisdictional waters. Therefore the wetland falls under Federal Regulations. Per Federal Regulations and Nationwide 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.

#### 5.2 SITE PREPARATION

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

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

# **5.2.1** Utility Clearance

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.

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.

## **5.2.2** MEC Clearance

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

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

## 5.2.3 Site Control and Access

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:

- 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
- Adhering to RVAAP traffic rules.

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 the SAIC Construction Manager.

The use of two-way radios and cell phones is permitted at the RVAAP. The SAIC Construction Manager will coordinate with RVAAP security to ensure that contact with Post 1 is maintained at all times.

# 5.2.3.1 Facility Access Protocol

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 on-site. Security personnel will confiscate prohibited items discovered during inspections.

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.

## 5.2.3.2 Site Access Protocol

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.

## **5.2.4** Construction Support Facilities

Construction support facilities for this RD may include:

- Sanitary facility;
- Equipment staging area;
- Access road improvements, and
- Truck haul route/loading area improvements.

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

#### 5.2.4.1 Access to Load Line 12

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.

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

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

## 5.2.5 Fueling Areas

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.

# **5.2.6** Vegetation Clearing

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

roots within the limits of excavation shall be removed and disposed of with the contaminated dry sediment.

## **5.2.7** Vehicle Access Routes

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

#### 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:

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

Structural BMPs to be employed at the site include:

- Improving roadways/haul routes;
- Dewatering/diversion berms; and
- Installing silt fencing.

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.

## 5.3.1.1 Main Ditch Water Diversion

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.

#### 5.3.1.2 Silt Fencing

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

# **5.3.2** Excavation Water Management

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.

# 5.3.3 Non-Contact Storm Water Management

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.

# **5.3.4** Erosion Control Schedule

Erosion/sedimentation control features will remain in place until completion of site restoration activities as determined by the SAIC Construction Manager and approved by Ohio EPA. Inspection of storm water controls will be performed by the Subcontractor on a daily basis during construction activities. After site restoration has been completed, inspection of storm water controls will be performed once every week until 70 percent vegetation cover has been achieved and erosion controls can be removed, as specified in Section 8.6 of this RD and the SWP3 (Attachment B). The Subcontractor also will inspect the storm water controls within 24 hours of any rain event greater than 0.5 inches. For rain events lasting longer than 24 hours, the Subcontractor will also inspect storm water controls at least every 24-hours of the event and within 24 hours of the event ending. These inspections will be performed in accordance with the CQAP in Section 10.0 of this RD.

#### 5.4 DUST AND WIND CONTROLS

All excavations, 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 generation activities may occur 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 applying water as required. The Subcontractor will employ water spraying/misting for dust control if airborne dust is observed. Water used for dust control will be clean (i.e., obtained from RVAAP sources with approval of the RVAAP Facility Manager or potable water obtained from an off-site source). The use of additives will not be permitted.

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, visual monitoring of fugitive dust emissions will be conducted daily during representatively normal operating conditions.

#### 5.5 GOOD HOUSEKEEPING

Good housekeeping practices are designed to maintain a clean and orderly work environment. Good housekeeping measures will include at a minimum:

- Regular pickup and disposal of garbage and sanitary waste material;
- Daily equipment and material inspections for leaks and/or conditions that could potentially 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 FWSHP (USACE 2001b) are understood by employees, contractors, and/or subcontractors, and that established 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 section describes the remedial activities to be performed in support of this RD:

- Land survey;
- MEC Avoidance;
- Excavation of contaminated dry sediment;
- Storm water controls; and
- Equipment decontamination.

Design Drawings (Attachment C) detailing remedial action requirements for the performance of dry sediment 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 remedial activities, work will stop immediately and the SAIC Project Manager, the USACE COR, and the RVAAP Facility Manager will be notified immediately. The condition will be assessed and a joint determination will be made regarding continuation of remedial activities. Work will not resume until approval 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

Prior to the start of excavation activities, a surveyor will establish the initial horizontal limits of excavation by land survey for each removal area. The excavation limits will be demarcated in accordance with Attachment C, Drawing C-5.

## 6.2 MEC AVOIDANCE

MEC encounters are not anticipated during the implementation of this remedial action. However, to ensure MEC will not pose a safety or health threat, a MEC Avoidance Subcontractor will be on-site during mobilization and remedial activities.

The MEC Avoidance Subcontractor (a U.S. Army and/or Department of Defense [DOD] certified UXO-Technician II) will perform a clearance of the areas to be disturbed during remedial action. The MEC Avoidance Subcontractor will provide personnel specifically trained in MEC identification, explosive items, and/or ordnance. Prior to and during excavation activities, the on-site MEC Avoidance Subcontractor will be responsible for 1) inspecting the excavation areas for the presence of MEC; 2) identifying items suspected of being MEC; and 3) contacting the Subcontractor SSHO and the SAIC Construction Manager upon discovery of MEC. The SAIC Construction Manager will contact the SAIC Project Manager, the USACE COR, and the RVAAP Facility Manager. In the event that a MEC is identified in the area, activities will cease until the MEC Avoidance Subcontractor takes active measures for removing the MEC.

#### 6.3 EXCAVATION

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 the May 2009 MI sampling event, a topographic survey conducted of the area and computer modeling. The current estimated in situ volume of dry sediment is 706 cubic yards.

The initial excavation will extend approximately one foot horizontally and vertically beyond the modeled extents of the ditch into native soil, this will be determined by visual observation. The vertical extent of the excavation will cease if bedrock is encountered.

# **6.3.1** General Sequence of Excavation

The general sequence of excavation is as follows:

- 1.) Land survey will be performed to establish the MI Sample Areas (Attachment C, Drawing C-5);
- 2.) Excavation of dry sediment (as presented on Attachment C, Drawing C-5);
- 3.) 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 7.0);
- 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.

#### **6.3.2** Excavation Activities

Excavation activities will be executed to reduce the handling of contaminated dry sediment and will include:

- 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  $1\frac{1}{2}$  H: 1 V ( $34^0$ ) or appropriate shoring will be installed. Excavation cave-ins are not likely with an excavation of 1 ft into the ditch bottom.

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

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.

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).

Confirmation samples will be collected prior to restoration of open excavations (Section 7.0). The excavation areas will be restored in accordance with Section 8.0 of this RD upon approval from the SAIC Construction Manager.

No suspect or unexpected materials, such as drums or cylinders, are anticipated during excavation activities. If unexpected site conditions or materials are 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).

#### 6.3.3 Dry Sediment Staging Area

A staging area for excavated dry sediment will not be necessary for the remedial activities at LL12 unless it is 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 6.0 and 7.0 of this RD.

## 6.4 DECONTAMINATION

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:

- 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).

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.

Prior to release of construction equipment from the site, the SSHO, or designee, will visually inspect (and document) construction equipment with specific attention to:

- Tires and wheels or tracks (as applicable);
- Undercarriage (frame, axles);
- Exterior surfaces (including steps, running boards);
- Engine compartment; and
- Operator compartment.

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# 7.0 CONFIRMATION SAMPLING

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

- 1.) Sample collection and analyses; and
- 2.) Evaluation/comparison against the cleanup goals.

#### 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.

The MI samples will be collected, processed, and analyzed. The sampling will be conducted remotely to ensure personnel do not enter the excavated areas. This remote sampling will be accomplished by use of an extension rod on a soil probe. No less than 30 aliquots will be collected from either of these devices within the specified MI area.

#### 7.2 CONFIRMATION SAMPLING PROCEDURES

All of 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.

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 noted in the project field books.

#### Sample Station Location Identification: XXXmm-NNN(n)-###-tt

XXX = Area Designator

L12 = Load Line 12

#### <u>mm</u> = Sample Location Type

sd = Sediment Sample Location

#### <u>NNN</u> = Sequential Sample Location Number

Unique, sequential number for each sample location beginning with Phase I RI stations and extending into any subsequent investigative phases (i.e., 001 – 999)

## (n) = Special Identifier

Optional use (as needed) to identify special sample matrices or sample location characteristics

M = Multi-Increment Sample

#### #### = Sequential Sample Identification Number

Unique, sequential number for each sample beginning with Phase I RI locations and extending into any subsequent investigative phases (i.e., 0001 – 9999)

tt = Sample Type

SD = Sediment Sample

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.

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

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

MI = Multi-Increment

L12 = Load Line 12

The sampling and analysis requirements are summarized in Table 7-2, as well as, the anticipated sample quantities and methods. Project Quantitation Levels (chemical concentration precision levels) will be in accordance with the Facility-Wide Sampling and Analysis Plan (USACE 2001a).

Table 7-2. Sampling and Analytical Requirements

								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
	Michigas	Dampies	Dampies	vvate1	Itilibutes	Diamin	Dampies	Dampies	Diams
Arsenic,	SW-846	4	1	0	0	0	5	O	0

A-E = Architect-Engineer

 $QA = Quality \ Assurance$ 

USACE = U.S. Army Corps of Engineers

## 7.3 CONFIRMATION OF CLEANUP GOAL

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

- 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.

Site restoration activities will occur as MI Sample Areas are confirmed not to exceed cleanup goals. Initiation of restoration activities will commence upon the approval from the SAIC Construction Manager in conjunction with the USACE COR and the Ohio EPA.

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## 8.0 SITE RESTORATION

Site restoration will begin after the analytical results of the confirmation samples confirm remedial action cleanup goals have been achieved. The Subcontractor will restore the site to the required conditions set forth in Attachment C, Drawing C-7. At a minimum, this will include:

- Grading and backfilling (where necessary) side-slopes of the Main Ditch to no less than 1 ½
  H: 1 V (34<sup>0</sup>);
- Backfilling, compacting and leveling the bottom of the Main Ditch to the existing grade to
  maintain drainage. It should be noted the intent of compacting the backfill is to match the
  existing grade, flow pattern and aesthetics of the Main Ditch and not to achieve a specific soil
  density;
- Installing erosion control matting (e.g., mulch mat) and seed on disturbed side slopes of the Main Ditch:
- Placing one 6-in course of rip rap (4 to 6 inch stone) in the bottom of the Main Ditch for erosion control;
- Grading, seeding, and mulching construction disturbed areas between Main Ditch and railroad bed:
- Installing a straw check dam at north end of excavated area within the Main Ditch; and
- Removing erosion controls once vegetation is established.

#### 8.1 RE-GRADING AND BACKFILL

The bottom of the excavation area will be backfilled, compacted and graded to original contours to maintain drainage. No less than one 6-inch course of rip rap will be installed over the backfill to prevent erosion. The side slopes of the Main Ditch shall be backfilled, and compacted in areas (northern portion) where existing side slopes are greater than 2 H : 1 V. In the southern portion of the Main Ditch, the side slopes shall be graded to no less than 1 ½ H : 1 V. Backfill material used for side slopes shall be able to support vegetation. In the event the selected backfill material will not, the Subcontractor will place at least 4 inches of topsoil over the backfill. Attachment C, Drawing C-7 presents the contour specified for site restoration.

Where necessary, ruts and depressions within the Construction Boundary (e.g., truck loading area and construction support area) will be re-graded. The Subcontractor will use approved backfill material for site restoration activities. Should the backfill material not be sufficient to support re-vegetation (e.g., clayey soil), a minimum of 4 inches of vegetative cover (e.g., topsoil) will be placed on the 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 FWSAP (USACE 2001a).

**Table 8-1. Borrow Source Sampling Analytical Requirements** 

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
рН	SW-846 9040/9045

PCB = Polychlorinated Biphenyl

SAP = Sampling and Analysis Plan

SVOC = Semi-Volatile Organic Compound

TAL = Target Analyte List

TCL = Target Compound List

VOC = Volatile Organic Compound

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

mg/kg = Milligrams per Kilogram

#### 8.2 REMOVAL OF PLACED STONE

Any stone placed on the existing access roads or haul truck route at LL12 will not require removal. 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.

## 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.

### 8.4 RE-VEGETATION

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.

Table 8-3. 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

The Subcontractor will use a Camp Ravenna-approved "open area" seed mixture for permanent cover for construction areas disturbed during field activities. Table 8-4 presents the seed mixture and 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 at 18 lbs/acre, drilled at 12 lbs/acre

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

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.

#### 8.5 REMOVAL OF EROSION CONTROLS

At the completion of the excavation, and prior to the removal of the dewatering berm/dam, the Subcontractor will install a straw bale check dam in the Main Ditch down gradient of the dewatering berm to prevent sediment transport to the downgradient Active Area Channel. The check dam will remain in place until grass coverage on the sidewalls of the Main Ditch is at least 70 percent established. Other existing erosion control measures shall remain in place until the grass is 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 achieved, the Subcontractor is responsible for the removal and disposal of all erosion control measures at that time.

# 9.0 WASTE CHARACTERIZATION AND DISPOSAL

This section describes waste characterization, transportation, and waste disposal activities that will be performed in support of implementing this RD. Waste includes remedial waste (e.g., excavated dry 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 FWSAP, Federal and State of Ohio Large-Quantity Hazardous Waste Generator Requirements, and RVAAP's Installation Hazardous Waste Management Plan. All waste will be appropriately accounted for as soon as possible and prior to conclusion of the project. Any shipment of solid or hazardous waste off site will comply with all appropriate federal and state laws.

#### 9.1 WASTE STREAM IDENTIFICATION

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

- Vegetation;
- Excavated dry sediment;
- 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:

- 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.

# 9.2 WASTE STREAM MANAGEMENT

Table 9-1 presents and discusses each potential waste stream 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.

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 the 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
		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.	nonhazardous).	
Decontamination	In the event that	Due to the	One representative	Decontamination fluids will
Fluids	disposable plastic	anticipated small	sample will be	be removed from the AOC
(Sampling Activities)	scoops cannot be	quantity generated,	collected and	by a licensed waste disposal
	used during	all IDW liquid will	characterized in	contractor and disposed at
	sampling, stainless-	be combined and	accordance with	an approved disposal facility
	steel spoons and	contained in a	Section 7.4 of the	permitted to accept the
	bowls will be used	labeled DOT	FWSAP.	waste.
	to collect samples.	approved 55-gal		
	These tools require	closed-top drum.		
	decontamination			
	between samples			
	resulting in the			
	generation of fluids.			

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

	Disposition
	Disposed in a licensed solid
	waste disposal facility in
	accordance with local, state
	and federal regulations.
non-indigenous activities. specified in Section	
solids) 7.3 of the FWSAP.	
	PPE will be disposed of in
	accordance with Section 7.5
	of the FWSAP (USACE
	2001a). It will be disposed
	of as either sanitary waste or
	as a permitted hazardous
	waste in a permitted
permitted hazardous the dry sediment it waste facility. was in contact with.	hazardous waste facility.
waste facility. was in contact with.	
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.	
Excavation Water Potentially Accumulated If characterization T	The Ohio EPA Project
generated in excavation water sampling results of C	Coordinator will determine
	the method of disposal from
	the following three choices:
	(1) land application
	(according to land
	application guidelines) a; (2)
	sanitary sewer disposal <sup>b</sup> , or
	(3) discharge to a suitable
	waste disposal facility with
	approval from
	RVAAP/SAIC.
excavation footprint sampling of will be covered excavation water be	Sediment collected in the
	bottom of the tank will be
	disposed of as excavated dry
	sediment.
parameters presented	ocamient.
in Table 1-1 of	
FWSAP QAPP	
(USACE 2001a) °.	

**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	Decontamination water will
Fluids	result of	excavation	required.	be disposed of in the haul
(Excavation	decontamination of	equipment will be		truck along with excavated
Equipment)	excavation	conducted over the		dry 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.		

<sup>&</sup>lt;sup>a</sup>The 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.

#### 9.3 INVESTIGATION-DERIVED WASTE FIELD STAGING

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 FWSAP (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.

Final inventories of IDW will be taken and provided to the RVAAP Facility Manager by the SAIC Construction Manager. All nonhazardous liquid waste not transported off of the facility within 30

<sup>&</sup>lt;sup>b</sup>Should 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.

<sup>&</sup>lt;sup>c</sup>The parameters include VOCs, SVOCs, pesticides, PCBs, explosives, nitroquandine, nitrocellulose, Polycyclic Aromatic Hydrocarbons (PAHs), metals (TAL), and cyanide.

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

#### 9.4 WASTE CONTAINERIZATION AND LABELING

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 prior to placement of material.

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

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

- Project name;
- Contents;
- Date waste was first placed into the container;
- Source location(s); and
- Emergency contact name and telephone number.

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

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

## 9.5 TRANSPORTATION, STORAGE, AND DISPOSAL

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

Contaminated dry sediment loaded into on-road haul trucks will be transported by licensed waste haulers to a RVAAP and SAIC approved licensed off-site disposal facilities as specified in Section 6.3.2. All transportation requirements, including proper labeling, placarding, and weight limits will be followed. All manifests, shipping documents, and disposal facility approval letters will be provided to SAIC and incorporated into the Construction Report.

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

This section presents the CQAP. The CQAP describes the inspection procedures and documentation required to ensure excavation, disposal, and restoration activities occur according to the requirements of this RD.

Protocols for reporting test results, certifying compliance with construction requirements, correcting construction deficiencies, and documenting such corrections are provided. This section also addresses the review and documentation requirements necessary to comply with the site restoration details contained herein.

#### 10.1 RESPONSIBILITY AND AUTHORITY

# 10.1.1 Responsibility

The organizational chart presented in Figure 2-1 outlines the management structure that will be used to implement the excavation and disposal activities in accordance with this RD. Functional responsibilities of key personnel were described in Section 2.1. The assignment of personnel to each position was based on the following:

- Qualifications;
- Experience; and
- Training.

The SAIC QA/QC Officer and SAIC Construction Manager, in coordination with the USACE COR, will ensure the completed remedial activities conform to the RD, design drawings, specifications, and any necessary permit conditions. The SAIC Project Manager will verify completion of these activities.

The SAIC Construction Manager will monitor excavation, disposal, and site restoration activities. The SAIC Construction Manager or designee will be on site during work activities to ensure that all components of this RD are fulfilled.

# 10.1.2 Administration and Operation

The QA/QC organization is administered by the SAIC QA/QC Officer in concert with the SAIC Construction Manager. The SAIC Construction Manager will be supported by the Subcontractor Construction Manager and technical staff (engineers, scientists, and technicians) as necessary.

All vendors supplying materials used for site restoration and storm water control will supply materials from manufacturing facilities with established QC programs. Results of the manufacturer QC procedures will be submitted to the QA/QC Officer for review, evaluation, and documentation prior to beginning field activities.

# 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.

#### 10.3 DAILY PLANNING BRIEFINGS

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

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. This briefing will include at a minimum the following:

- 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.

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

## 10.4 INSPECTION ACTIVITIES

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 inspection is described below.

# 10.4.1 Spill Control

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).

Spills will be responded to as presented in Section 12.1.2 of the FWSHP 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.

The SAIC Construction Manager will ensure the spill is reported to RVAAP Army Staff. Should the spill occur on OHARNG property, the SAIC Construction Manager will notify Camp Ravenna Operations and ensure the incident is documented on a Camp Ravenna Spill Incident Reporting Form.

#### 10.4.2 Storm Water Controls

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.

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 once per week,, within 24 hours of a storm event (0.5 inches or greater), and at least every 24 hours during extended rain events.

# 10.4.3 Dust Control

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 applying 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 implemented to

minimize the potential for dust generation. The Subcontractor SSHO will conduct daily inspections during representatively normal operating conditions as described in Section 5.4 and the SSHP.

# **10.4.4 Survey**

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

#### 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 7.0 and Attachment C, Drawing C-7. The Subcontractor will obtain and apply the seeding mixture as prescribed within Section 8.5.

#### 10.5 SPILL RESPONSE

Spills will be responded to as presented in Section 12.1.2 of the FWSHP. 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. The SAIC Construction Manager will determine whether the leak poses an environmental risk or will exceed the capacity of on-site personnel and equipment. In the unlikely event that there is a probability that the spill will extend beyond the immediate area, result in an environmental insult, or exceed the capabilities of the on-site personnel, the SAIC Construction Manager will inform the local fire department and hazardous materials response team. If this is not the case, the on-site spill kit will be utilized to clean up the spill.

# 10.6 CONFIRMATION REQUIREMENTS

## 10.6.1 Confirmation Sampling

Confirmation sampling will be performed in accordance with Section 7.0 of this RD and the FWSAP (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 analytical laboratory.

#### 10.6.2 Verification of Achievement of Performance Criteria

The SAIC Construction Manager will confirm the results meet the cleanup goals. The USACE COR and Ohio EPA Project Coordinator will be notified of the evaluations and results. If any sample does not meet the cleanup goals, the evaluation will include a description of the additional excavation based on the approach described in Section 7.3. Confirmation sampling results will be included in the Construction Report.

#### 10.7 **DOCUMENTATION**

#### **10.7.1** Field Documentation

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 Manager.

The daily reports may include:

- Summary of activities performed at the project site;
- Daily Subcontractor inspection activities (e.g., storm water controls, spill-control barriers, equipment staging/fueling areas);
- Weather information;
- Departures from the approved RD;
- Problems encountered during field activities;
- Subcontractor submittals; and/or
- Subcontractor certifications (e.g., health and safety records).

Copies of the construction activity forms, checklists, and daily reports are included in Attachment D.

#### 10.7.2 Remedial Action Report

Upon completion of remedial activities, a Construction Report will be prepared by SAIC. The Construction Report will document:

- The project was performed in accordance with this RD (i.e., complied with requirements, technical specifications, construction drawings, and other relevant contract documents), and all applicable regulations, including surface water and air regulations;
- Documentation of any approved field variances from this RD (e.g., unforeseen site condition, change in material); and
- Corrective actions and achievement of remedial goals.

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## **Attachment A**

## Site Safety and Health Plan for the Final 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:

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October 1, 2009

## **APPROVALS**

Final

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

## September 2009

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#### ACRONYMS AND ABBREVIATIONS

A2 Suspected Human Carcinogen

A3 Not Classifiable as a Human Carcinogen

ACGIH American Conference of Governmental Industrial Hygienists

AOC Area of Concern

Ca Potential Occupational Carcinogen

Camp Ravenna Camp Ravenna Joint Military Training Center

CFR Code of Federal Regulations
CIH Certified Industrial Hygienist
COPC Constituent of Potential Concern
CPR Cardiopulmonary Resuscitation
CSP Certified Safety Professional

E2I Energy, Environment and Infrastructure Business Unit

EH&S Environmental, Health and Safety
E&I Engineering and Infrastructure

eV Electron Volts

FBQ Fuze and Booster Quarry

FM Field Manager
FP Flash Point
FS Feasibility Study

FWSHP Facility-Wide Safety and Health Plan GFCI Ground Fault Circuit Interrupter

HAZWOPER Hazardous Waste Operations and Emergency Response

H&S Health and Safety

HTRW Hazardous, Toxic, and Radioactive Waste

IDLH Immediately Dangerous to Life and Health

IDW Investigation-Derived Waste

IP Ionization Potential

IRP Installation Restoration Program

LEL Lower Explosive Limit

LL12 Load Line 12

MEC Munitions and Explosives of Concern

MI Multi-Increment

MSDS Material Safety Data Sheet

NA Not Applicable

NGB National Guard Bureau

NIOSH National Institute for Occupational Safety and Health

NRR Noise Reduction Rating
OE Ordnance and Explosive

OEW Ordnance and Explosive Waste
OHARNG Ohio Army National Guard

Ohio EPA Ohio Environmental Protection Agency

OJT On-the-Job Training

## **ACRONYMS AND ABBREVIATIONS (CONTINUED)**

O&M Operations and Maintenance

OSHA Occupational Safety and Health Administration

PCB Polychlorinated Biphenyl
PEL Permissible Exposure Limit
PID Photoionization Detector
PPE Personal Protective Equipment

ppm Parts Per Million
PVC Polyvinyl Chloride
RA Remedial Action

RI Remedial Investigation

RRSE Relative Risk Site Evaluation
RVAAP Ravenna Army Ammunition Plant

SAIC Science Applications International Corporation

SSHO Site Safety and Health Officer SSHP Site Safety and Health Plan STEL Storm-Term Exposure Limit

TBD To Be Determined
TLV Threshold Limit Value
TWA Time-Weighted Average
UEL Upper Explosive Limit

USACE U.S. Army Corps of Engineers

UXO Unexploded Ordnance

VP Vapor Pressure

#### 1.0 Introduction

Science Applications International Corporation's (SAIC's) formal policy, stated in the Environmental, Health and Safety (EH&S) Program manual, is to take every reasonable precaution to protect the health and safety of our employees, the public, and the environment. To this end, the Ravenna Army Ammunition Plant (RVAAP) *Facility-Wide Safety and Health Plan* (FWSHP) (USACE 2001) and this Site Safety and Health Plan (SSHP) collectively set forth the specific procedures required to protect SAIC and SAIC subcontractor personnel involved in the field activities. These plans are driven by requirements contained in the most current revisions of the U.S. Army Corps of Engineers (USACE) *Safety and Occupational Health Requirements for Hazardous, Toxic, and Radioactive Waste (HTRW) Activities, ER-385-1-92, Safety and Health Requirements for Munitions and Explosives of Concern, EM-385-1-95,* and the USACE *Safety and Health Manual, EM-385-1-1*, which are available online via the USACE web site. SAIC activities are also subject to the requirements of the SAIC Corporate EH&S Program and associated 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 must have and use their own safety programs and plans in compliance with applicable regulations.

The FWSHP addresses program issues, hazards, and hazard controls common to the entire installation. This SSHP Addendum to the FWSHP serves as the lower tier document addressing the hazards and controls specific to the Remedial Action (RA) at Load Line 12 (LL12) (RVAAP-12). Copies of the FWSHP and SSHP Addendum will be present at the work site during all fieldwork.

# 2.0 FACILITY DESCRIPTION AND CONTAMINATION CHARACTERIZATION

#### 2.1 FACILITY DESCRIPTION

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.

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 3 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 County. RVAAP/Camp Ravenna is a parcel of property approximately 11 miles (17.7 km) long and 3.5 miles (5.6 km) wide bounded by State Route 5, the Michael J. Kirwan Reservoir, and the CSX System Railroad on the south; Garret, McCormick, and Berry roads on the west; the Norfolk Southern Railroad on the north; and State Route 534 on the east (Figure 1). Camp Ravenna is surrounded by several communities: Windham on the north; Garrettsville 6 miles (9.6 km) to the northwest; Newton Falls 1 mile (1.6 km) to the southeast; Charlestown to the southwest; and Wayland 3 miles (4.8 km) to the south.

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.

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.

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.

#### 2.2 LOAD LINE 12 DESCRIPTION

Load Line 12 covers about 80 acres in the southeastern portion of RVAAP. Load Line 12 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. The Remedial Investigations (RIs) also identified an area immediately north of the LL12 (informally termed the Team Track Area) that was apparently used for offloading and staging of materials used in Load Line 12 production activities.

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.

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.

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 cubic feet 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.

#### 2.3 PREVIOUS ACTIVITIES

Previous investigations at LL12 include a Relative Risk Site Evaluation (RRSE); a Phase I and Phase II 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.

#### 2.4 PROJECT SCOPE

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:

- 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.

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; drowning; temperature extremes; stinging/biting insects; poisonous plants; and snakes.

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

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.

#### 2.5 CONTAMINANTS

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

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

Analyte	Units	LL12 Maximum Detect
	Metals	
Aluminum	mg/kg	197,000
Arsenic	mg/kg	418
Manganese	mg/kg	8700
Or	ganics-Explosi	ves
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
Org	anics-Semi-Vol	atile
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

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.

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

Table 3-1. Hazards Inventory

OE = Ordnance and Explosives

#### Specific tasks are as follows:

- Excavation using heavy equipment 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;
- Surveying performed by the Subcontractor;
- Investigation-derived waste handling and disposition performed by the Subcontractor; and
- Equipment decontamination performed by both SAIC and the Subcontractor.

#### 3.1 POTENTIAL EXPOSURES

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

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

#### 3.2 TASK-SPECIFIC HAZARD ANALYSIS

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

**Table 3-2. Potential Exposures** 

		Health Effects/	Chemical and Physical	Exposure
Chemical <sup>a</sup>	TLV/PEL/STEL/IDLH <sup>b</sup>	Potential Hazards <sup>c</sup>	Properties <sup>c</sup>	Route(s) <sup>c</sup>
Arsenic	TLV/TWA: 0.005 mg/m <sup>3</sup> , A3	Potential carcinogen per NIOSH,	Silver-gray or tin-white, brittle,	Inhalation
	PEL/TWA: 0.010 mg/m <sup>3</sup>	ulceration of nasal septum,	odorless solid	Absorption
	IDLH: 5 mg/m <sup>3</sup>	dermatitis, gastrointestinal	FP: NA; IP: NA	Ingestion
		disturbances, peripheral neuropathy,		Contact
		respiratory irritation,		
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

<sup>&</sup>lt;sup>a</sup>The potential chemicals were obtained from the *Phase I and Phase II Remedial Investigation Reports* for LL12 (USACE 1998, 2004).

<sup>&</sup>lt;sup>c</sup>From NIOSH Guide to Chemical Hazards web site.

A2 = suspected human carcinogen	LEL = Lower Explosive Limit	ppm = Parts Per Million
A3 = not classifiable as a human carcinogen	mg/m <sup>3</sup> = Milligrams per Cubic Meter	STEL = Short-Term Exposure
Ca = potential occupational carcinogen	mm = Millimeters	Limit
eV = Electron Volts	NA = Not Applicable	TLV = Threshold Limit Value
FP = Flash Point	NIOSH = National Institute for Occupational Safety and Health	TWA = Time-Weighted
IDLH = Immediately Dangerous to Life and Health	PEL = Permissible Exposure Limit	Average
IP = Ionization Potential		UEL = Upper Explosive Limit
		VP = Vapor Pressure

 $<sup>^</sup>b$ From 2008 Threshold Limit Values, *American Conference of Governmental Industrial Hygienists*.

Table 3-3. Hazards Analysis

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 FWSHP).  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 Code of Federal Regulations (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 Occupational Safety and Health Administration (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 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. Material Safety Data Sheets (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 FWSHP). Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FWSHP).	Visual survey

Table 3-3. Hazards Analysis (continued)

Safety and Health Hazards	Controls	Monitoring Requirements
Vehicle accidents	Compliance with Energy, Environment and Infrastructure (E2I) EH&S Procedure	Verification of valid drivers
	110 "Vehicle Operation" to include verification of current drivers licenses, use of	licenses by field manager (FM)
	seat belts when vehicle is in motion, daily (undocumented) vehicle safety inspection,	
	compliance with applicable laws and regulations, and defensive driving.	
Temperature extremes	Administrative controls (see Section 8.0 of FWSHP). 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 FWSHP). Chilled drinks if temperature exceeds 70°F and warm	the start of each break if
	drinks 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 daily prior to
	immediate area or upstream of site.	starting work.
Drowning	When possible, the water in the ditch will be released or pumped to a portable water tank	The water depth in the ditch will
	when accumulation poses a potential drowning hazard. Personal flotation device will be	be monitored.
	worn when working within 6 ft of water deeper than 3 ft.	
	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 FWSHP). 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.	

Table 3-3. Hazards Analysis (continued)

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 FWSHP). 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 FWSHP). Chilled drinks if temperature exceeds 70°F and warm	the start of each break if
	drinks 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 daily prior to
	immediate area or upstream of site.	starting work.
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 lbs.	lifting by SAIC personnel by
		FM

Table 3-3. Hazards Analysis (continued)

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 FWSHP).	
	Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FWSHP).	
Drowning	When possible, the water in the ditch will be released or pumped to a portable water tank	The water depth in the ditch will
	when accumulation poses a potential drowning hazard. Personal flotation device will be	be monitored.
	worn when working within 6 ft of water deeper than 3 ft.	
V	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 FWSHP). 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 ≥ NRR 25 within 25 ft (7.6 m) of operating chainsaw or heavy	Daily safety inspections
	equipment unless specific monitoring indicates noise exposure of less than 85 dBA.	

Table 3-3. Hazards Analysis (continued)

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	Daily safety inspection
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	
	Visual and instrument surveys
*	by OE technicians following
•	requirements of Safety and
suspected ordnance is discovered.	Health Requirements for
	Munitions and Explosives of
	Concern (MEC), ER-385-1-95.
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. Hazardous waste	during vegetation clearing
site operations training and medical clearance. Site training must include the hazards	activities and daily safety
and appropriate controls for site contaminants and chemicals to be used or stored on-	inspection.
site. Chemical containers labeled to indicate contents and hazard. Medical clearance	
for hazardous waste work.	
Administrative controls (see Section 8.0 of FWSHP). Cooled (shaded) or warmed	Temperature measurements at
break area depending on the season. Routine breaks in established break area (see	least twice per day. Pulse rates
Section 8.0 of FWSHP). Chilled drinks if temperature exceeds 70°F and warm	at the start of each break if
drinks if temperature is below 50°F.	wearing impermeable clothing.
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 daily prior to
immediate area or upstream of site.	starting work.
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.	
	Verification/observation of
lifts by SAIC personnel to 50 lbs.	lifting by SAIC personnel by
	FM.
	turned off and allowed to cool for at least 5 minutes prior to fueling.  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.  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.  Administrative controls (see Section 8.0 of FWSHP). Cooled (shaded) or warmed break area depending on the season. Routine breaks in established break area (see Section 8.0 of FWSHP). Chilled drinks if temperature exceeds 70°F and warm drinks if temperature is below 50°F.  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.  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.

Table 3-3. Hazards Analysis (continued)

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 FWSHP).	
	Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FWSHP).	
	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 FWSHP). Buddy system. Site-specific training. Proper	equipment to verify brakes and
	housekeeping. Unnecessary personnel will stay well clear of operating equipment.	operating systems are in proper
	Functional back-up alarm on fork trucks, Bobcats, trucks. Ravenna Operations and	working condition.
	Maintenance (O&M) contractor personnel will provide any required fork truck services	
	in the Investigation-Derived Waste (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.

Table 3-3. Hazards Analysis (continued)

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 lbs.	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 minutes before fueling. Fire extinguishers in all fuel use areas.		
Noise	Hearing protection within 25 ft (7.6 m) 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 FWSHP).		
	Avoidance of accumulations of bird or bat droppings (see Section 9.0 of FWSHP).		
Electric shock	Identification and clearance of overhead utilities. Ground Fault Circuit Interrupter	Visual survey of all work areas	
	(GFCI) for all electrical hand tools.		
Temperature extremes	mperature extremes Administrative controls (see Section 8.0 of FWSHP). Cooled (shaded) or warmed		
	break area depending on the season. Routine breaks in established break area (see	least twice daily. Pulse rates at	
	Section 8.0 of FWSHP). Chilled drinks if temperature exceeds 70°F and warm	the start of each break if	
	drinks if temperature is below 50°F.	wearing impermeable clothing.	

Table 3-3. Hazards Analysis (continued)

Safety and Health Hazards	Controls	Monitoring Requirements
Severe weather	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	strong winds, or heavy rain.
	not work in areas subject to flash flooding (arroyo, ditch, etc.) if rain is forecast in	Check forecast daily prior to
	immediate area or upstream of site.	starting work.
	Equipment Decontamination (Water Washing)	
General equipment decontamination	Level D PPE plus nitrile or PVC gloves (see Section 5.0 of FWSHP). Face shield	Daily safety inspections
hazards (water, slips, falls,	and 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 lbs.	lifting by SAIC personnel by
		FM
Temperature extremes	Administrative controls (see Section 8.0 of FWSHP). 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 FWSHP). Chilled drinks if temperature exceeds 70°F and warm	the start of each break if
	drinks if temperature is below 50°F.	wearing impermeable clothing.

Table 3-3. Hazards Analysis (continued)

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 daily prior to	
	immediate area or upstream of site.	starting work.	
Site 1	Preparation, Excavation, Truck Loading, and Site Restoration using Heavy Equipmen	ıt	
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 ft 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.		

Table 3-3. Hazards Analysis (continued)

Safety and Health Hazards	Controls	Monitoring Requirements	
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.		
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 25 feet (7.6 meters) of backhoe or similar equipment	Daily safety inspections	
	unless equipment-specific monitoring indicates exposures less than 90 dBA.		
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	of	
	bird or bat droppings (See Section 9.0).		
Electric shock	Identification and clearance of overhead and underground utilities per E2I EH&S Visual surv		
	Procedure 130.		

Table 3-3. Hazards Analysis (continued)

Safety and Health Hazards	Controls	Monitoring Requirements
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 $50^{0}$ 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 daily prior to
	immediate area or upstream of site.	starting work.
Drowning	When possible, the water in the ditch will be released or pumped to a portable water tank	The water depth in the ditch will
	when accumulation poses a potential drowning hazard. Personal flotation device will be	be monitored.
	worn when working within 6 ft of water deeper than 3 ft.	

E2I = Energy, Environment and Infrastructure Business Unit EH&S = Environmental, Health and Safety FM = Field Manager

 $FWSHP = Facility\text{-}Wide\ Safety\ and\ Health\ Plan$ 

GFCI = Ground Fault Circuit Interrupter
IDW = Investigation-Derived Waste

MSDS = Material Safety Data Sheet NRR= Noise Reduction Rating

OE = Ordnance and Explosives

O&M = Operations and Maintenance PID= Photoionization Detector

PPE = Personal Protective Equipment

PVC = Polyvinyl Chloride

RVAAP = Ravenna Army Ammunition Plant

SAIC = Science Applications International Corporation

UXO = Unexploded Ordnance

# 4.0 STAFF ORGANIZATION, QUALIFICATIONS, AND RESPONSIBILITIES

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

Table 4-1. Staff Organization

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 <sup>1</sup>	TBD	
MEC Avoidance Subcontractor	TBD	

<sup>&</sup>lt;sup>1</sup> Subcontractor Site Safety and Health Officer will be SSHO for all remedial activities.

CIH= Certified Industrial Hygienist

CSP = Certified Safety Professional

MEC = Munitions and Explosives of Concern

## 5.0 TRAINING

Training requirements, from Section 4.0 of the FWSHP, are summarized in Table 3-2 and in Table 5-1 below:

**Table 5-1. Training Requirements** 

Training	Worker	Supervisor	Site Visitor (exclusion zone)
	VVOIRCI	Supervisor	(exclusion zone)
HAZWOPER (40-hr, 3-day OJT)	V	V	٧
HAZWOPER Annual Refresher (8 hr)	$\sqrt{}$		$\sqrt{}$
HAZWOPER Supervisors Training (8 hr)		V	
CPR and First Aid Training	V	V	
General Hazard Communication Training	V	V	V
Respiratory Protection Training	√	√	V
(required only if respirators are worn)			
Hearing Conservation Training (for workers in hearing	√	√	V
conservation program)			
Pre-entry Briefing	V	V	V
Site-Specific Hazard Communication (contained in pre-entry	√	V	V
briefing)			
Safety Briefing (daily and whenever conditions or tasks	√	√	V
change)			
Equipment-Specific Training (Equipment Operators)	V		
OSHA Excavation Competent Person Training		√	

 $<sup>\</sup>sqrt{}$  = required.

HAZWOPER = Hazardous Waste Site Operations and Emergency Response

OJT = On-the-Job Training.

OSHA = Occupational Safety and Health Administration

CPR = Cardiopulmonary Resuscitation

## 6.0 PERSONAL PROTECTIVE EQUIPMENT

General guidelines for selection and use of PPE are presented in the FWSHP. Specific PPE requirements for this work are presented in the hazard/risk analysis section (Section 3.0).

## 7.0 MEDICAL SURVEILLANCE

Medical surveillance requirements, as presented in Section 6.0 of the FWSHP, are summarized in Table 7-1.

**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	

All medical exams shall include (see Section 6.2 of the FWSHP):

- Medical/work history;
- Physical exam by physician;
- Audiometry;
- Blood screening and blood count;
- Chest x-ray, as specified by physician;
- Electrocardiogram, as specified by physician;
- Spirometry; and
- Urinalysis.

#### 8.0 EXPOSURE MONITORING/AIR SAMPLING PROGRAM

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 established for this monitoring. In addition to the specified monitoring, the SSHO may perform or require additional monitoring, such as organic vapor monitoring in the equipment decontamination area or personnel exposure monitoring for specific chemicals. The deployment of monitoring equipment will depend on the activities being conducted and the potential exposures. All personal exposure monitoring records will be maintained in accordance with 29 *Code of Federal Regulations* 1910.20. The minimum monitoring requirements and action levels are presented in Table 8-1.

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

- 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.

The SSHO will examine site conditions and will contact the Health and Safety Manager to initiate monitoring if there is any indication of potential airborne exposure.

**Table 8-1. Monitoring Requirements and Action Limits** 

Hazard or Measured					
Parameter	Area	Interval	Limit	Action	Tasks
Visible airborne dust potentially containing site- related compounds	All	Continuously	Visible dust generation	Stop work; use dust suppression techniques such as wetting surface	All
Airborne organics with PID or equivalent	Breathing zone 3 ft (0.9 m) from source or 14 inches (0.36 m) 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	Require the use of hearing protection	Hearing protection will be worn within the exclusion zone, around power augers, or other motorized equipment

H&S = Health and Safety

PID = Photoionization Detector

PPE = Personal Protective Equipment

ppm = Parts Per Million

TWA = Time-Weighted Average

# **HEAT/COLD STRESS MONITORING** 9.0 General requirements for heat/cold stress monitoring are contained in Section 8.0 of the FWSHP.

#### 10.0 STANDARD OPERATING SAFETY PROCEDURES

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

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 traffic on improved roads, maintaining the posted speed limit, and applying water as required. The Subcontractor will employ water spraying/misting for dust control if airborne dust is observed. Water used for dust control will be clean (i.e., obtained from RVAAP sources with approval of the RVAAP Facility Manager, or potable water obtained from an off-site source). The use of additives will not be permitted.

#### 11.0 SITE CONTROL MEASURES

Site control measures are described in Section 10.0 of the FWSHP. No formal site control is expected to be necessary for this work, as the work area is somewhat remote and bystanders are not anticipated. The RVAAP installation is not open to the public, and only authorized personnel are allowed in LL12. However, an exclusion zone will be established around the excavation as described in Sections 9.7 and 10.1 of the FWSHP. If the SSHO determines that a potential exists for unauthorized personnel to approach within 25 ft of a work zone or otherwise be at risk due to proximity, then additional site controls will be established as described in the FWSHP.

## 12.0 PERSONNEL HYGIENE AND DECONTAMINATION

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

### 13.0 EMERGENCY PROCEDURES AND EQUIPMENT

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

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

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

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) 336-6041 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		

RVAAP = Ravenna Army Ammunition Plant

USACE = U.S. Army Corps of Engineers

Ohio EPA = Ohio Environmental Protection Agency

SAIC = Science Applications International Corporation, Inc.

CIH= Certified Industrial Hygienist

CSP = Certified Safety Professional

# 14.0 Logs, Reports, and Record Keeping

Logs, reports, and record keeping requirements are described in Section 13.0 the FWSHP.		

#### 15.0 REFERENCES

- 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.

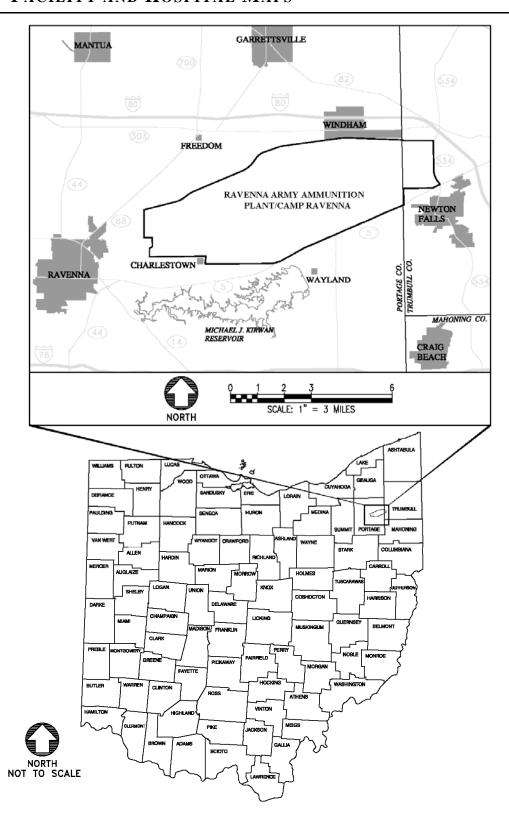


Figure 16-1. General Location and Orientation of RVAAP/Camp Ravenna

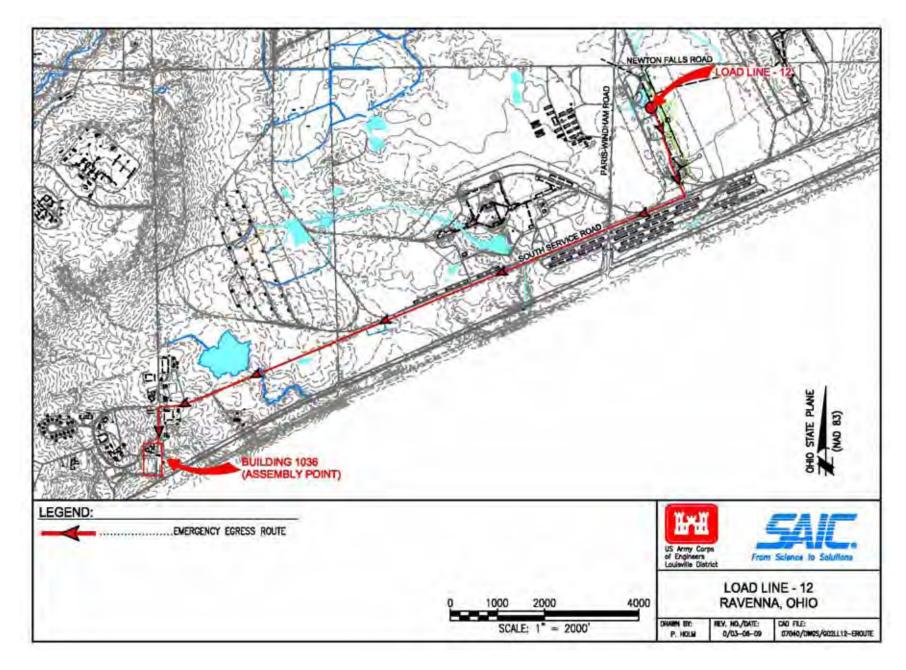


Figure 16-2. RVAAP/Camp Ravenna Site Map and Egress Route

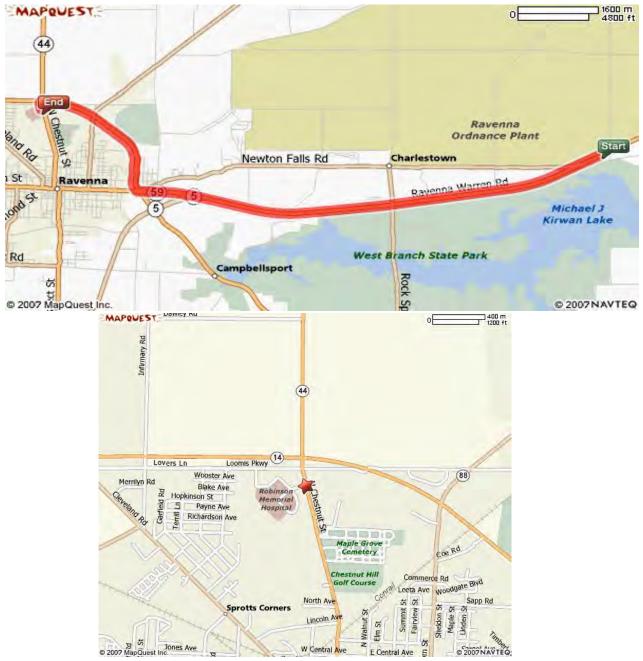


Figure 16-3. Route Map to Pre-Notified Medical Facility

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 Final 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

October 1, 2009

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## LIST OF APPENDICES

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

BGS Below Ground Surface
BMP Best Management Practice

COC Constituent of Concern

COR Contract Officer Representative Construction Quality Assurance Plan **CQAP DFFO** Director's Final Findings and Orders **FWSHP** Facility-Wide Safety and Health Plan **GSA** General Services Administration **IDW** Investigation-Derived Waste IRP **Installation Restoration Program ISCP** Installation Spill Contingency Plan

LL12 Load Line 12 LUC Land Use Control

MEC Munitions and Explosives of Concern

MI Multi-Increment

NGB National Guard Bureau

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

PBC Performance-Based Contract

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

#### 1.0 Introduction

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 work is being performed under a Performance-Based Contract (PBC) in accordance with U.S. General Services Administration (GSA) Environmental Advisory Services Contract GS-10-F-0076J. In addition, planning and performance of all work elements is being conducted in accordance with the requirements of the Director's Final Findings and Orders (DFFO) dated June 10, 2004 (Ohio EPA 2004).

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.

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

#### 1.1 FACILITY DESCRIPTION

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.

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 3 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 County. RVAAP/Camp Ravenna is a parcel of property

approximately 11 miles (17.7 km) long and 3.5 miles (5.6 km) wide bounded by State Route 5, the Michael J. Kirwan Reservoir, and the CSX System Railroad on the south; Garret, McCormick, and Berry roads on the west; the Norfolk Southern Railroad on the north; and State Route 534 on the east (Figures 1-1 and 1-2). Camp Ravenna is surrounded by several communities: Windham on the north; Garrettsville 6 miles (9.6 km) to the northwest; Newton Falls 1 mile (1.6 km) to the southeast; Charlestown to the southwest; and Wayland 3 miles (4.8 km) to the south.

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.

#### 1.2 LOAD LINE 12 DESCRIPTION AND HISTORY

LL12 covers about 80 acres in the southeastern portion of RVAAP. Elevations across LL12 range from approximately 970 to 987 ft amsl. 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). Surface water drainage flows generally from south to north across LL12. At LL12, the Main Ditch that bisects the central part of the AOC flows from the north into drainage ditches north of the AOC. The Main Ditch is heavily wooded. A stream traverses LL12 from west to east and intercepts the Main Ditch near the northern boundary of the AOC. Ultimately the drainage flows into the Cobbs Pond complex (Upper/Lower Cobbs Pond) several hundred yards to the north of LL12. However, in recent years a beaver colony has constructed dams north of LL12. These structures have prevented surface water drainage from the AOC. As a result of these dams, stagnant water often resides within the Main Ditch and Active Area Channel.

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 LL12 contained former production areas. The eastern half was previously cleared, but did not contain any known production facilities.

#### 1.3 LOAD LINE 12 REMEDIAL ACTIVITIES

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

remedial activities in accordance with Section 4.0 of the RD. Table 1-1 presents estimated waste quantities required for removal from the LL12 Main Ditch.

**Table 1-1. Estimated Quantities of Waste** 

		In situ Amounts	
Waste Material	Surface Area	Volume <sup>a</sup>	Weight <sup>b</sup>
Dry Sediment (Main Ditch at LL12)	$2,118 \text{ yd}^2$	706 yd <sup>3</sup>	1,130 tons

<sup>&</sup>lt;sup>a</sup>Excavation to depth of 1 ft below ground surface (BGS)

A remedial action will be performed at LL12 in accordance with the RD. The following activities summarize elements of the remedial action:

- Excavate contaminated dry sediment from LL12;
- Transport and dispose 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).

The remedial activities at LL12 will not impact adjacent wetlands. The area within the limits of excavation will be dammed from down gradient surface water during excavation activities and appropriate storm water controls will be implemented until the 70 percent density of vegetation is achieved. Additionally storm water that comes in contact with the excavation area will be filtered, containerized, and sampled to determine ultimate disposition.

<sup>&</sup>lt;sup>b</sup>Assumes 1.6 tons/cubic yard soil density

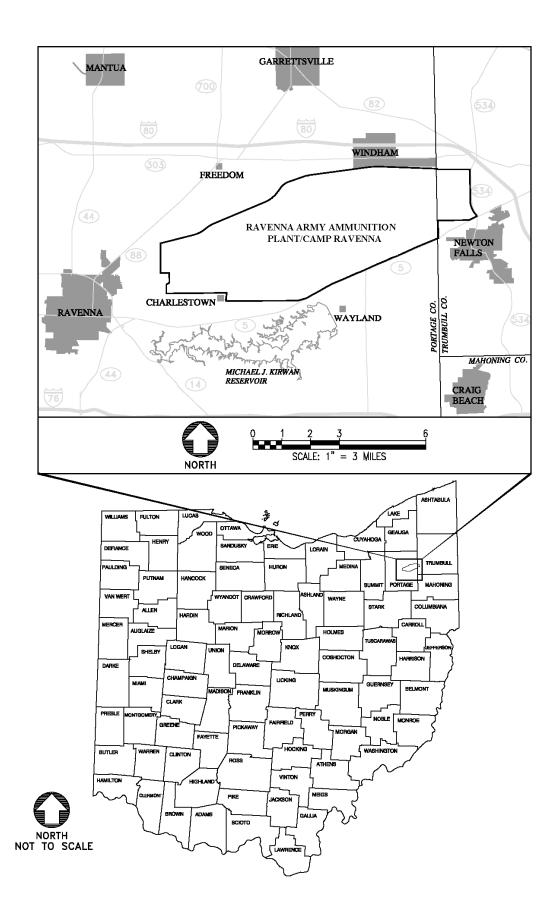


Figure 1-1. General Location and Orientation of RVAAP/Camp Ravenna

Figure 1-2. RVAAP/Camp Ravenna Installation Map

#### 2.0 DESCRIPTION OF REMEDIAL ACTIVITIES

This section provides general site information related to storm water pollution prevention in accordance with permit requirements.

#### 2.1 SEQUENCE OF MAJOR ACTIVITIES

Proper sequencing or phasing of major activities provides various site controls including limiting the amount of disturbed area at one time. For the purposes of this plan, site activities and general phasing are summarized as follows:

#### Phase I

- 1.) Notification and clearance of utilities:
- 2.) Preparation of site construction support area and installation of necessary storm water controls and BMPs (specified in Attachment C, Drawing C-4):
  - a. Prepare haul truck routes and truck loading areas.
  - b. Install silt fence and sandbag dams per specifications.
  - c. Prepare storm water temporary storage tank, hoses, and pump.
- 3.) Maintain sediment and erosion controls.

#### Phase II

After sediment controls are installed and construction support areas are prepared, excavation can commence. The objective of phasing is to minimize disturbed areas and therefore minimize potential issues regarding excavation water or sediment laden run-off due to storm events. Phase II shall involve the following:

- 1.) Removal of contaminated dry sediment in the Main Ditch;
- 2.) Analytical confirmation of dry sediment removal;
- 3.) Survey limits of excavation;
- 4.) Backfill and grade excavation areas; and
- 5.) Maintain sediment and erosion controls.

#### Phase III

Site restoration activities will commence when excavation is complete and include the following:

- 1.) Final grading of backfilled excavation area;
- 2.) Installation of rip rap in bottom of Main Ditch;
- 3.) Installation of straw check dam in Main Ditch;
- 4.) Installation of erosion control matting and seeding on side slopes of Main Ditch;
- 5.) Grade 4 inches of topsoil over disturbed areas (if necessary);

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

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.

#### 2.2 ESTIMATED TOTAL DISTURBED AREA

The total construction area (limits of work) within LL12 to be disturbed is 2.31 acres. 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, gravel access roads), equipment staging (roll-off containers, temporary storage tanks), and areas needed for constructability and execution. These features are portrayed in Attachment C, Drawing C-4.

#### 2.3 RUN-OFF COEFFICENT

Surface water drainage flows generally from south to north across LL12. A prominent drainage ditch (Main Ditch) divides LL12 in half. The project area will be restored in accordance with Section 8.0 of the RD. Existing access roads and former railroad bed will be used by haul trucks. No new impervious areas will be left onsite following remedial activities. The existing impervious areas (gravel and paved access roads) shall remain at project completion. The areas are classified as open space for pre-construction and post-construction and will be given a runoff coefficient of 0.2 for both scenarios in accordance with Table 1 in PartIII.G.2.e of the Ohio EPA Construction General Permit No. OHC000003.

#### 2.4 LOAD LINE 12 SOIL

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).

#### 2.5 RECEIVING STREAM

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

the drainage flows into the Upper and Lower Cobbs Ponds several hundred yards to the north of LL12. However, beaver activity has prevented drainage of the Main Ditch to the northern drainage ditches. Clearing of riparian areas, vegetation, and trees shall be minimized during remedial activities. Sediment and erosion controls shall be installed prior to earth disturbing activities to minimize impacts to the adjacent wetland at LL12. Construction site storm water associated with disturbed areas shall be collected in a temporary storage tank for characterization and proper disposal.

#### 2.6 COPY OF PERMIT

A copy of the permit to authorize storm water discharges associated with construction activities will be submitted as Appendix A of this plan when it is obtained.

#### 2.7 SITE MAP

A SWP3 drawing (Attachment C, Drawing C-4) has been prepared in accordance with permit requirements. The drawings address the following:

- 1.) Limits of earth disturbing activities;
- 2.) Existing topography;
- 3.) Surface water locations;
- 4.) Location of BMPs; and
- 5.) Storage areas and construction entrances.

#### 3.0 STORM WATER CONTROLS

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 and methods:

- Non-Structural
  - o Preservation methods
  - o Existing access roads
- Erosion Control Practices
  - Project phasing
  - Stabilization/seeding (temporary/permanent)
- Run-on and Run-off Control Practices
  - Excavation water storage tank
  - o Dewatering berms (sandbags, cofferdams)
- Sediment Control Practices
  - o Silt fence
  - o Straw bale filters (check dam)
  - o Improved haul truck routes

#### 3.1 Non-Structural Preservation Methods

The Subcontractor shall preserve the existing vegetation as much as feasible outside the limits of work. In addition, the Subcontractor shall perform the construction activities with an approach so as to limit the amount of land disturbed at one time. Site work shall only be conducted within the project limits.

#### 3.2 EROSION CONTROL PRACTICES

Erosion control practices minimize the transport of soil particles by concentrated flows of water or wind. The following erosion control practices shall be employed as part of the construction activities at LL12:

- Project phasing; and
- Stabilization/seeding.

The Subcontractor shall install all erosion control BMPs at the site, as required.

As detailed in Section 2.0, project phasing is an important tool to minimize disturbed areas and in turn minimize erosion. Stabilization of the excavated areas is regulated under the SWP3 requirements.

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).

#### 3.2.1 Temporary Seeding

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.

#### 3.2.2 Permanent Seeding

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.

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

The Subcontractor will use a Camp Ravenna-approved "open area" seed mixture for permanent cover for construction areas disturbed during field activities. Table 3-2 presents the seed mixture and application specifications. Fertilizer and lime are not needed for seeding with native seed mixes.

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

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

Other effective materials may be used, to include 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 3-1 and 3-2 and applicable Ohio EPA storm water pollution prevention controls. It should be noted that seed application rates are specified by OHARNG and do not adhere to those specified in the Ohio EPA SWPPP Construction Site Inspection Checklist.

#### 3.2.3 Mulching

Straw mulch shall be applied at a rate necessary to uniformly cover all disturbed areas; a rate of three bales per 1,000 square feet 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.

#### 3.2.4 Irrigation

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

#### 3.3 RUN-ON/RUN-OFF CONTROL PRACTICES

#### 3.3.1 Diversion Berms

The Main Ditch at LL12 discharges into the Active Area Channel which generally flows 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 discharge pipe at the south end of the Main Ditch. This plug will be inspected daily. Additionally, the Subcontractor shall install a dewatering berm (sandbags, temporary cofferdam, or an equivalent watertight barrier) north 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.

#### 3.3.2 Excavation Water

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

#### 3.3.3 Soil Stockpiles

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

#### 3.3.4 Dewatering Berm

Downgradient of the Main Ditch excavation area 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. In the event water remains inside the dewatering berm/dam, prior to excavation, the water shall be pumped through a sediment filter bag and discharged into the Active Area Channel. Excavation water captured during excavation activities will be managed per Section 9.2.6 of the RD.

#### 3.4 SEDIMENTATION CONTROL PRACTICES

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

• Silt fence:

- Straw bale filters; and
- Improved haul truck routes.

The Subcontractor shall install all sediment control BMPs at the site prior to beginning ground disturbance, maintain all controls for the duration of the project, and provide additional controls as required.

#### 3.4.1 Silt Fence

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.

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.

#### 3.4.2 Haul Truck Routes

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 reuse a former railroad bed adjacent to the Main Ditch at LL12 as a haul truck route and loading area, which consists of existing ballast material spread on the ground (Attachment C, Drawing C-3). Additional stone may be required to further improve the haul truck route for truck loading and traffic. Haul trucks will continue onto the improved road at the northern end of LL12. Haul trucks will exit LL12 through a gate and onto Newton Falls Road. The haul truck route shall remain in place at the completion of restoration activities at LL12.

#### 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.

The implementation schedule (Table 3-3) for the RD presents an estimated timeline for implementation.

- Site preparation/set-up;
- Excavation and removal;
- Confirmation sampling;
- Site restoration;

- Demobilization; and
- Preparation of the Construction Report.

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.

Table 3-3. Project Schedule

Item	Task Name	Date	
1	Final Remedial Design Approved	Pending Ohio EPA and Army Approval	
2	Mobilization to site	14 days after subcontractor notice to proceed	
3	Site Preparation	5 days after item 2	
4	Excavation and Removal	10 days after item 3	
5	Confirmation Sampling and Analysis	10 days after item 4	
6	Ohio EPA Review of Confirmation Samples	4 days after item 5	
7	Site Restoration	4 days after item 6	
8	Demobilization	1 day after item 7	
9	Post Construction Storm Water Monitoring	7 days after item 7	
10	Removal of Storm Water Controls	To be determined	

#### 4.0 MAINTENANCE AND INSPECTIONS

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

#### 4.1 PREVENTIVE MAINTENANCE

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

#### 4.2 FUGITIVE DUST

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

#### 4.3 DEWATERING

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.

#### 4.4 COVERS OR TARPS

Impermeable covers or tarps shall also be provided by the Subcontractor at the construction site. The covers shall be utilized as an additional aid to prevent storm water from contacting the contaminated dry sediment. Tarps will be placed over all exposed contaminated dry sediment, and secured with sand bags at the end of each day. Sand bags placed at the perimeter shall also serve as storm water diversions to minimize run-on. The tarps shall be sized appropriately to minimize overlap within the 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 STREET SWEEPING

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.

#### 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.

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.

Spill cleanup procedures outlined in Section 12.1.2 of the Facility-Wide Safety and Health Plan (FWSHP) (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.

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.

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

- 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)
- 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.
- 4.) Notify the security dispatcher (Guard Post 1) and the SAIC Construction Manager as soon as possible.
- 5.) Complete necessary paperwork as required by the RVAAP ISCP (PIKA 2009) and OHARNG 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.

#### 4.7 Non-Sediment Pollution Control

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

Good housekeeping practices include:

- Neat and orderly storage;
- Prompt clean up of spills; and
- Minimizing off-site tracking.

#### 5.0 Inspection of Controls and Plan Revisions

#### 5.1 INSPECTION OF CONTROLS

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 Construction Quality Assurance Plan (CQAP) in Section 10.0 of the RD. Daily inspections of all storm water controls shall be performed by the Subcontractor Construction Supervisor and documented on a RVAAP Load Line 12 Remedial Action Daily Checklist. The Subcontractor also shall inspect the storm water controls once every week and within 24 hours after any storm event producing greater than 0.5 inches of rain per 24 hour period (OHC000003 Part III.G.2.i). The inspection requirements include but not limited to the following items (as applicable):

- Construction entrances;
  - Locations where vehicles enter or exit the site shall be inspected for evidence of offsite sediment tracking.
- Non-sediment pollution control;
  - o 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.

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

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.

#### 5.2 PLAN REVISIONS

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.

#### **6.0** Post Construction

#### 6.1 POST CONSTRUCTION STORM WATER MANAGEMENT

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

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

#### 6.2 POST CONSTRUCTION BMPS

Post-construction BMPs are not required for this project. Permanent alteration (adversely impacting) the watershed and permanent installation of impervious surfaces are not proposed. The project site shall be returned to a more natural condition and the watershed shall be improved.

### 7.0 NOTICE OF TERMINATION

A Notice of Termination (NOT) shall be submitted following final stabilization of the disturbed areas. Final stabilization includes a vegetative cover with a density of at least 70% and approval from SAIC Construction Manager and USACE COR or designee. All temporary sediment control practices are to be removed upon final stabilization.

#### 8.0 CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

Signed:	Date:	Date:	
Signed:	Date:		

## 9.0 CONTRACTOR'S 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 as	ctivities and details presented in this			
plan identified as part of this certification.				
Signed:	Date:			

#### 10.0 REFERENCES

- 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.

#### APPENDIX A

# PERMIT TO AUTHORIZE STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES

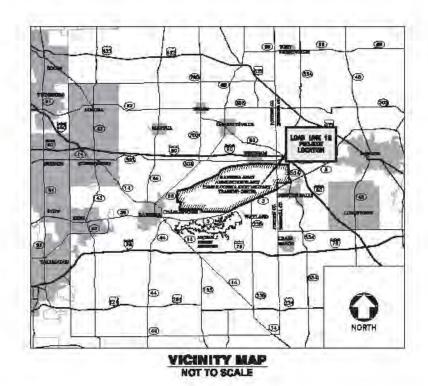
(TO BE INCLUDED WHEN OBTAINED)

## 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

## U.S. ARMY ENGINEER DISTRICT CORPS OF ENGINEERS RAVENNA ARMY AMMUNITION PLANT -LOAD LINE 12 REMEDIAL DESIGN





THIS REMEDIAL DESIGN ADDRESSES THE EXCAVATION AND OFF-SITE DISPOSAL OF APPROXIMATELY 70% CUBIC TARGE OF CONTAMINATED DRY SEDIMENT (IN STUD) FROM THE DRAINAGE DITCH (NAM DITCH) LOCATION AT THE ADAULT OF THE TRANSPAC CENTER IN ADMINISTRA, ONIO,

SOOPS OF WOR



U.S. Army Engineer District Corps of Engineers Louisville, Kentucky

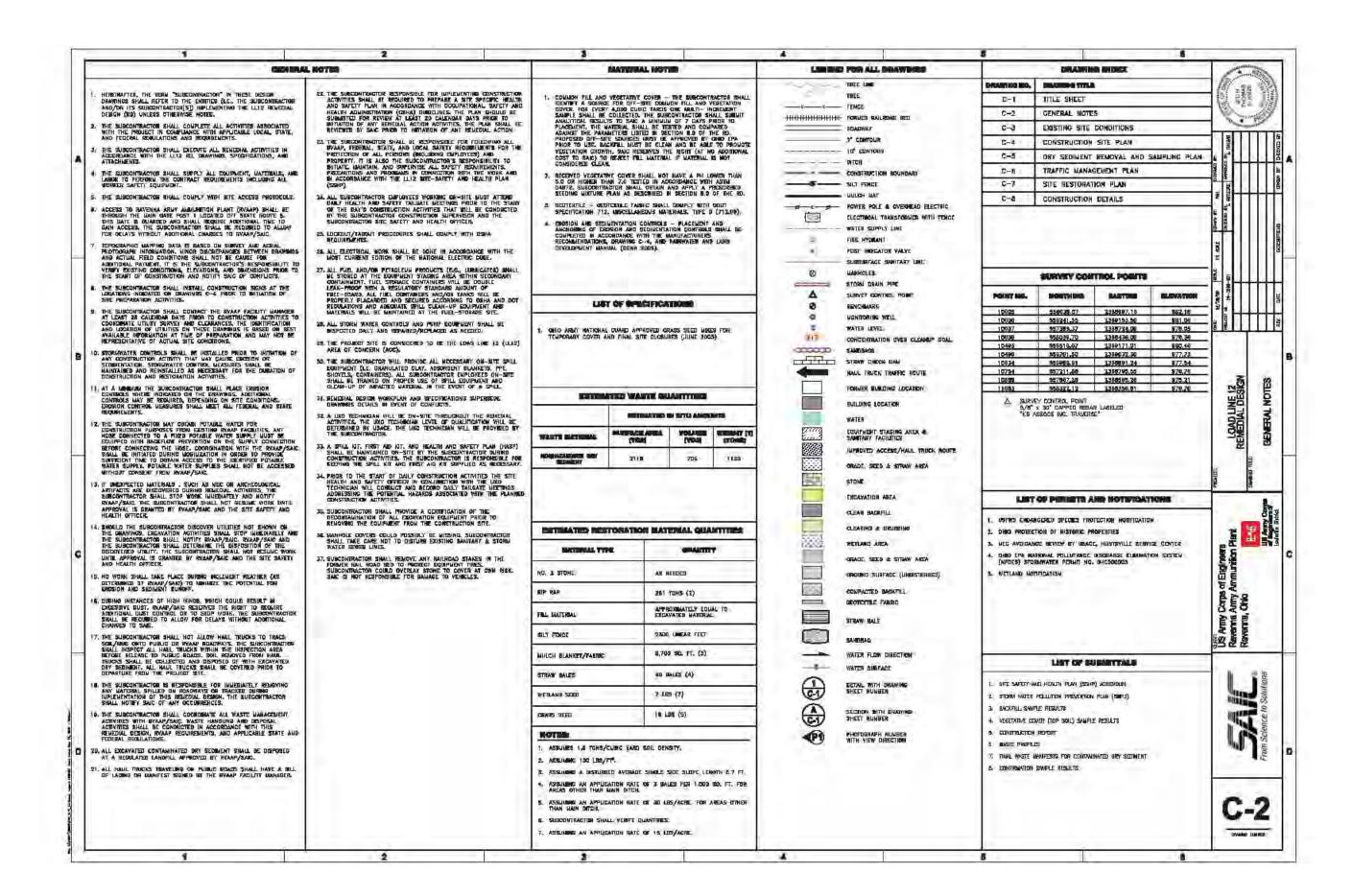


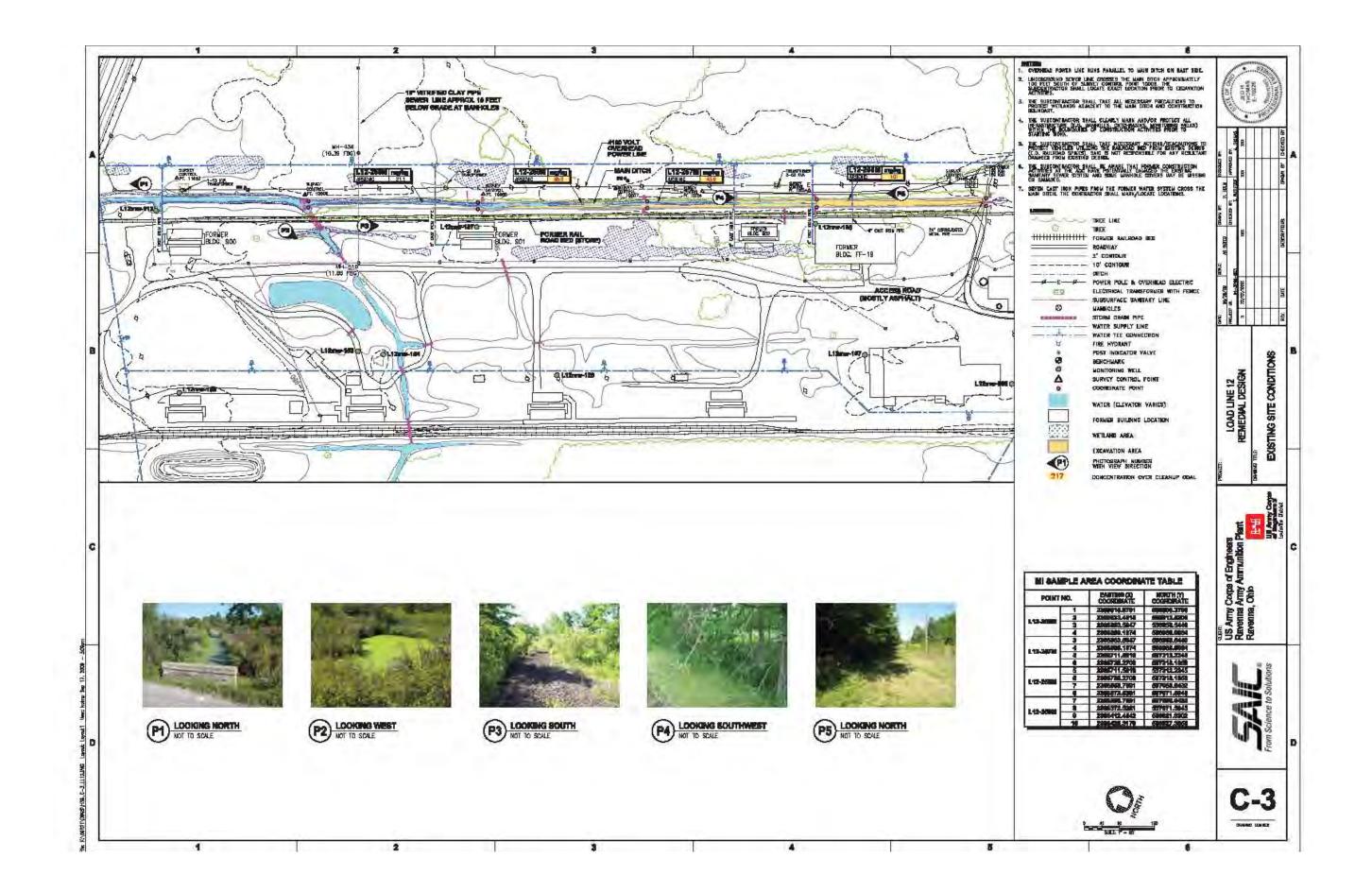
Science Applications International Corp.
Engineering of Ohio, Inc.
Twinsburg, Ohio

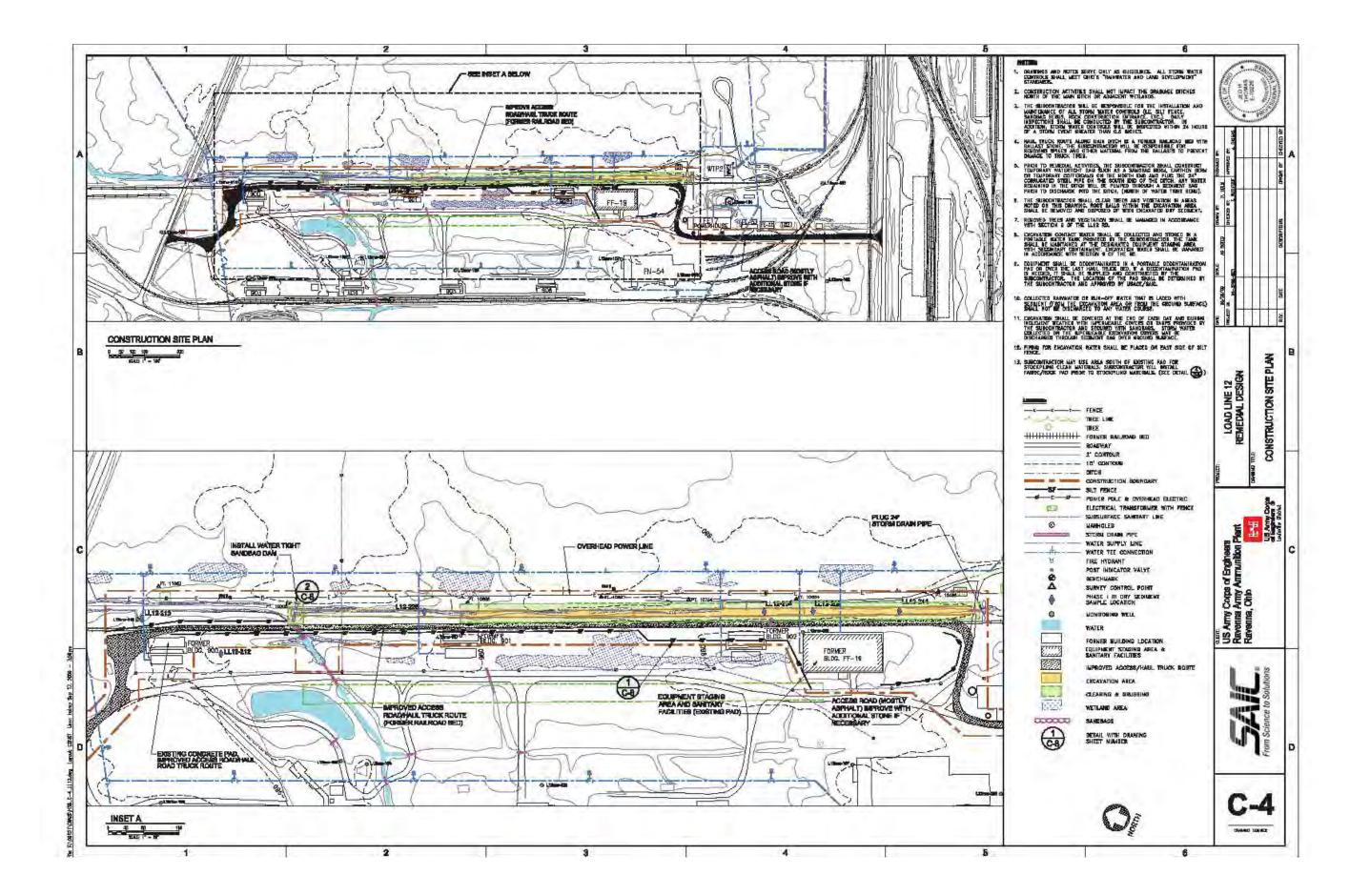


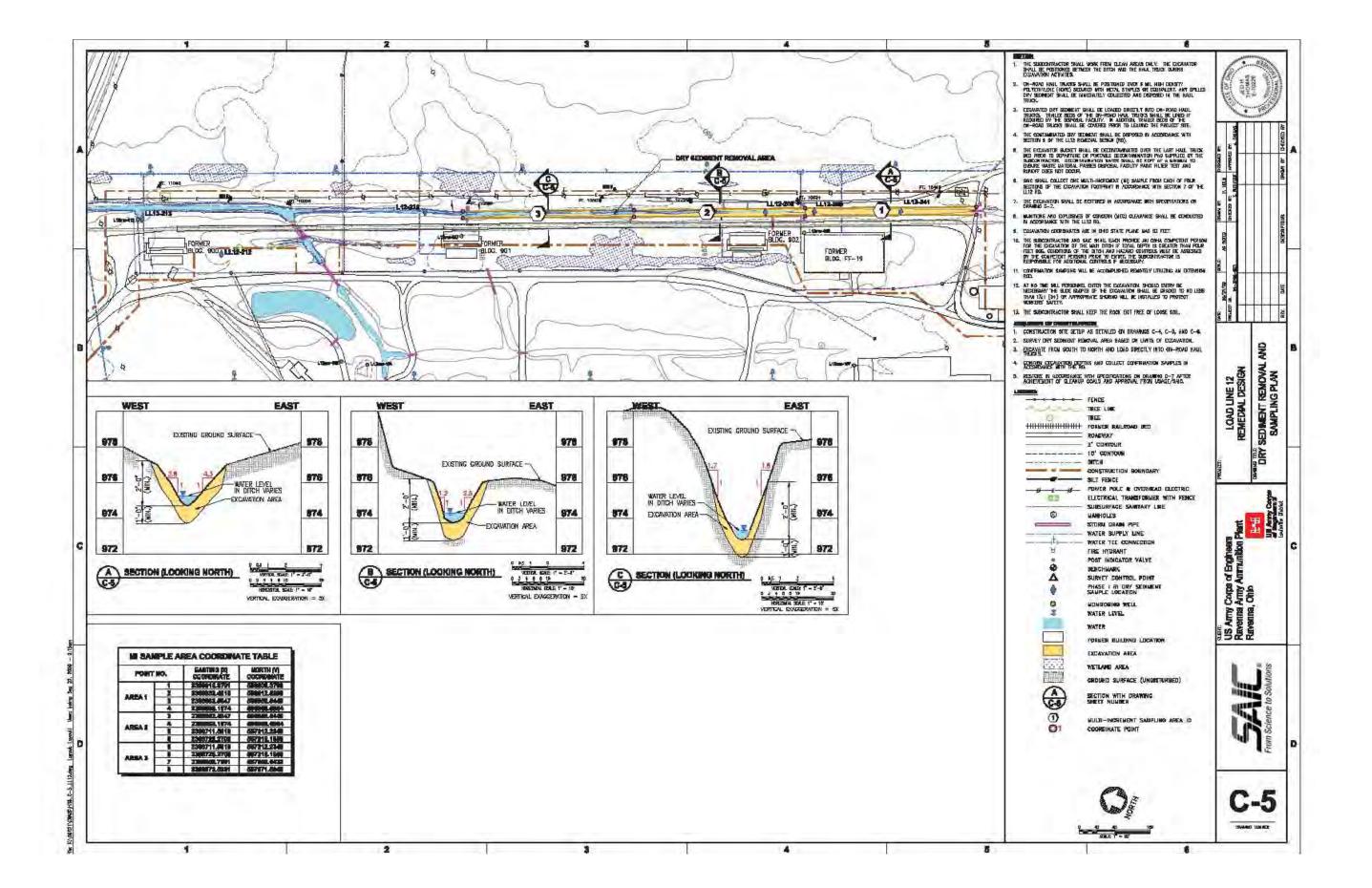


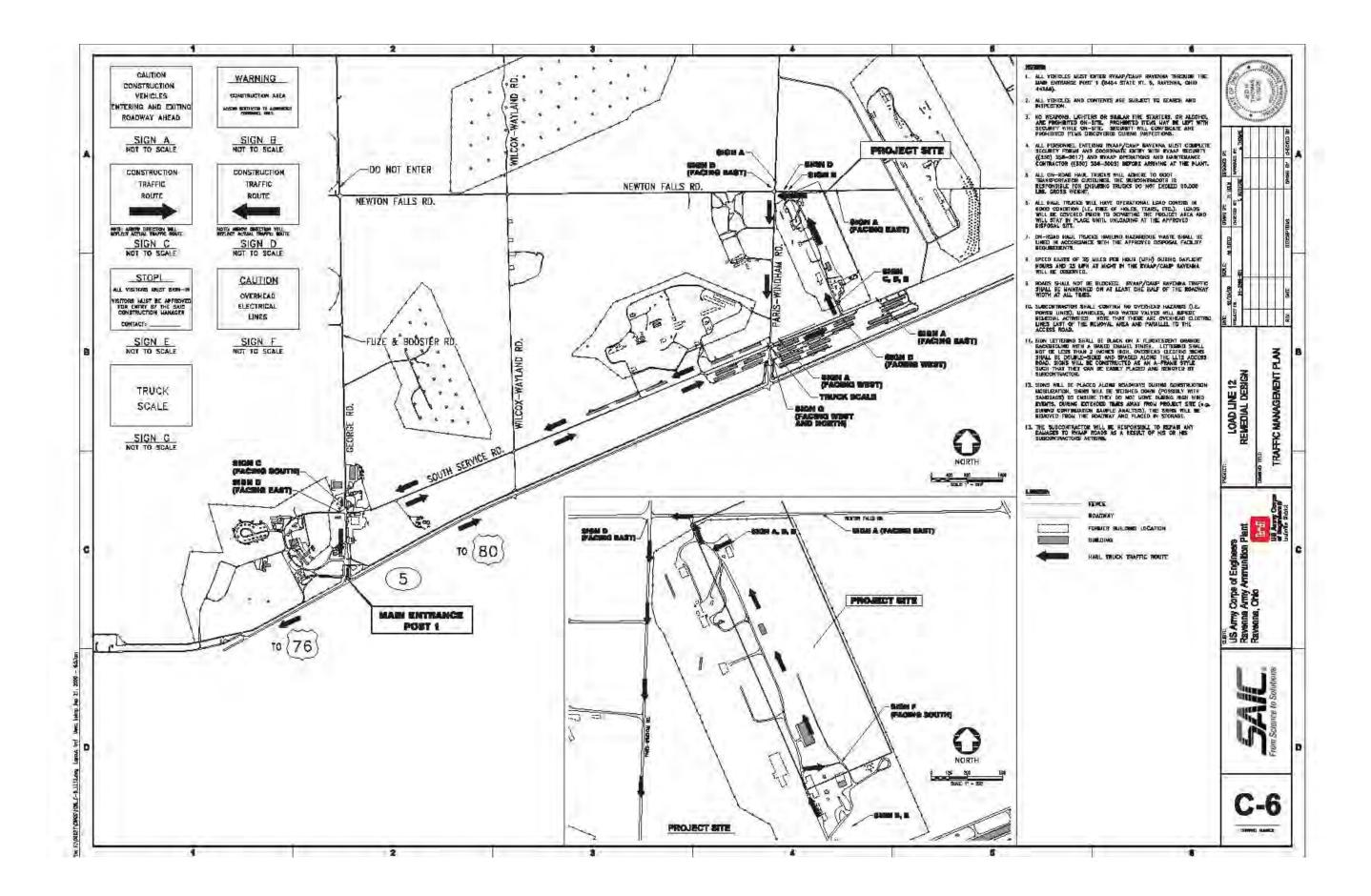


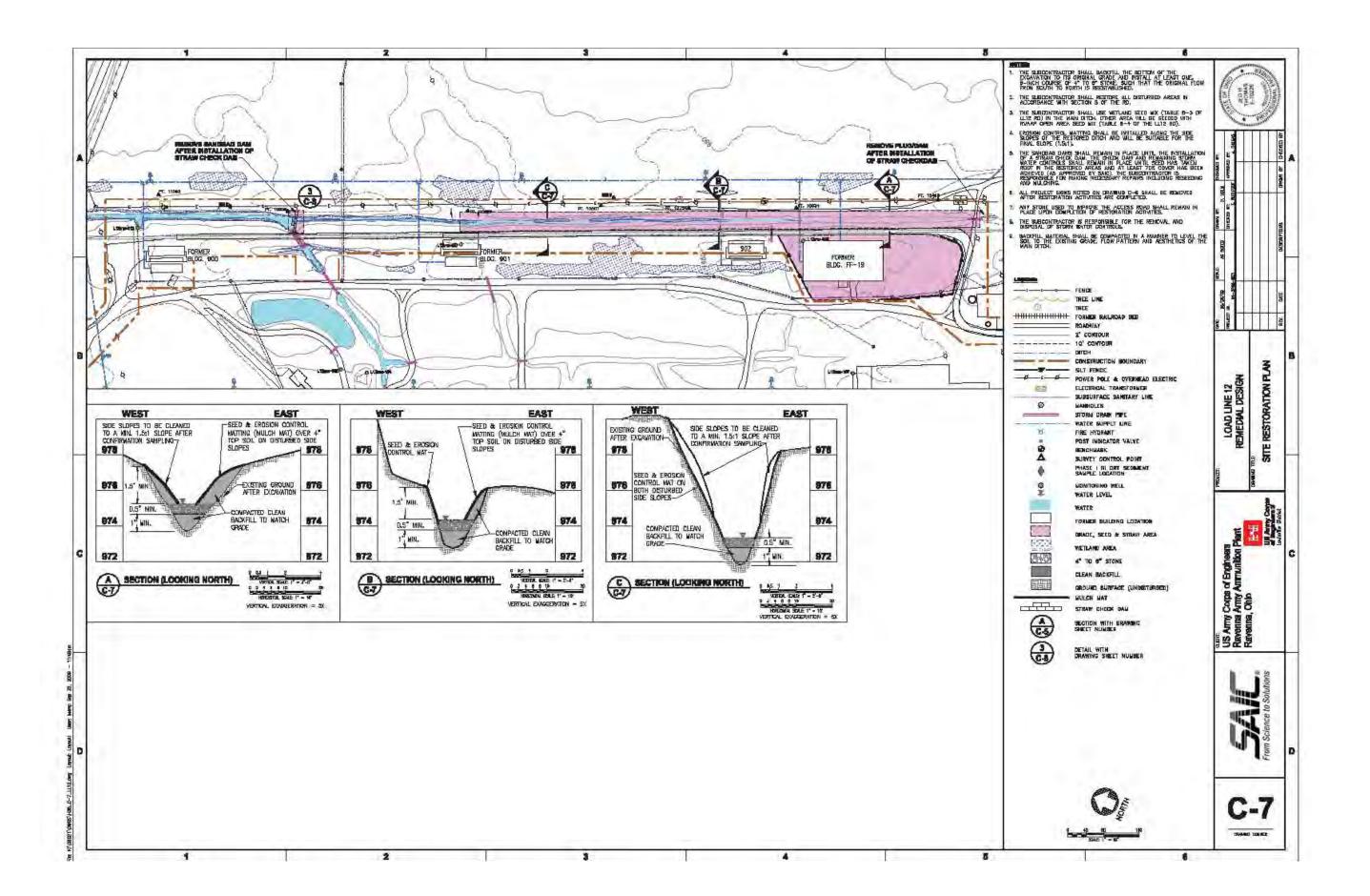


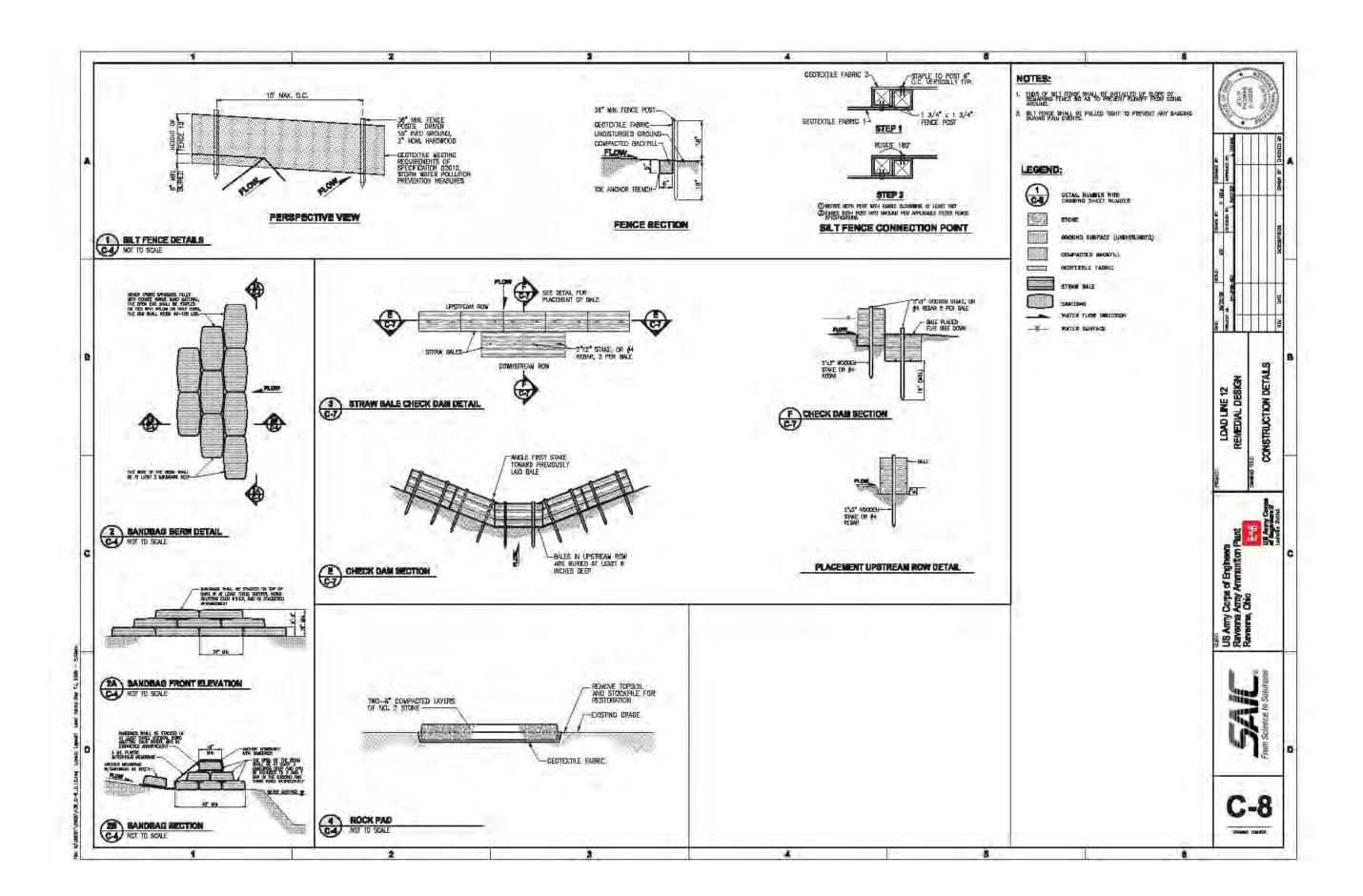














## **RVAAP Load Line 12 Remedial Design**

DAIL	Y CH	IECK	LIST			DATE:	
			·	Inches			
<u>Yes</u>	<u>No</u>	<u>N/A</u>					
			DAILY TAILGATE S	AFETY BRIEFING AND FOR	RM COMPLETED		
			DAILY INSPECTIONS	S			
			SWP3 controls (bern	ns, silt fence, inlet protection	on, etc.) Morning Insp	ection:	
			Time Completed:				
			Is standing water pres	sent?			
			Is excavation water pr	resent?			
			If yes, describe action	:			
			Are there etructurel es	entrole in place? If you come	slata tabla balaw		
Ш	Ш	Ш		ontrols in place? If yes, comp			
			Type of Control	Location of Control	Condition of	Sediment Depth	
					Control	(Inches)	
			Any Maintenance required:				
			Work to be performed by:On or be			efore:	
			General Work Area Inspection:  Time Completed:  Work area in good shape (e.g., no debris)? If no, describe actions taken.				

Page 1 of 4

Intials .

DAIL	DAILY CHECKLIST DATE:								
Yes	No	N/A							
			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:						
			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						

Intials

DAIL	DAILY CHECKLIST DATE:					
<u>Yes</u>	<u>No</u>	<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 Protection sloped. If yes, what angle:  Water kept out of excavation. If no, describe action Excavation work WITHOUT entry. If no, contact controls measures (i.e. safe entry exit, hazardous)	ection: ons taken. Project Manager prior to		
			PHOTOGRAPHS TAKEN  What was photographed	Number taken (photo	log numbers)	
			<ul> <li>DAILY MEASUREMENTS OF EXCAVATION AND estimated volume/tons</li> <li>number of trucks</li> </ul>	REA		
			COMPLETED TRUCK INSPECTION FORMS			
			COORDINATE WITH CONTRACTOR ON NEXT Excavation area Number of trucks available Weather forecast	DAY'S EXCAVATION	PLAN	
			EXCAVATOR BUCKET WRAPPED IN POLY A	ND SECURED		
			DAILY COVER (EXCAVATION)			

Page 3 of 4

DAIL	AILY CHECKLIST DATE:											
Yes	<u>No</u>	N/A										
	П	П	EQUIPMENT AND SAFETY FENCE SECURED AROUND EXCAVATION AREA									
			LOG BOOK COMPLETED									
$\Box$		П	ARE SHIPPING PAP	ARE SHIPPING PAPERS/MANIFESTS READY FOR NEXT WORK DAY								
$\Box$		П	COMPLETED SWPS	INSPECTION AFTER RAIN I	EVENT DURING WOI	RKING HOURS.						
_			COMPLETED SWPS INSPECTION AFTER RAIN EVENT DURING WORKING HOURS.									
	END OF DAY INSPECTION											
			SWP3 controls (bern	ns, silt fence, inlet protectio	n, etc.) End of Day Ir	spection:						
			Time Completed:									
			Is standing water pres	ent?								
			Is excavation water pr	esent?								
			If yes, describe action									
			_			_						
			Are there structural co	ntrols in place? If yes, compl	ete table below.							
			Type of Control	Location of Control	Condition of	Sediment Depth						
					Control	(Inches)						
						1						
			Any Maintenance requ	uired:								
			Work to be performed	by:	On or be	efore:						
QA E	QA By:											

DAILY REPORT		DATE:
Weather Condition	A.M.	
	P.M.	
Subcontractors On-Site		
Equipment On-Site		
Visitors On-Site		
Work Performed		
Work Fortoning		
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		
Completed by:		 QA by

# RVAAP Load Line 12 Remedial Design Initial Installation Inspection for Storm Water Controls

Date/Time:	Completed by:	
Initial Installation Inspection for Storm Water Controls Is the silt fence at least 4 inches to 6 inches into the ground Is the trench backfilled to prevent runoff from cutting und. Is the silt fence pulled tight so it will not sag when water be Are the ends brought upslope of the rest of the silt fence so going under the ends? Is the silt fence on a level contour? Have all gaps and tears in the silt fence been eliminated?	d? Yes  erneath the silt fence? Yes  ouilds up behind it? Yes	No
Maintenance required for above issues:		

## 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

#### 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? How much 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: State: Report Date & Time:							
On Scene Coordinator Name and Grade: Phone:							
on beene coordinator Name and Grade.							
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).  What remedial action was taken?							
What remedial action was taken?  Was soil and absorbent material generated? How much?							
What remedial action was taken?  Was soil and absorbent material generated?  What is the location of the soil and absorbents?							
What remedial action was taken?  Was soil and absorbent material generated?  What is the location of the soil and absorbents?  Was the Environmental Office contacted (yes or No, date and time)?							

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 (614) 336-6041 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	Operations and Training	(614)336-6041 or 6562	Contact Alternate
Tim Morgan (Primary OSC)	Environmental Supervisor	(614)336-6568	(330)322-7098
Katie Elgin	<b>Environmental Specialist</b>	(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)

Windham Fire Department ......9-1-330- 326-2222
Portage County Sheriff ......9-1-330-296-5100

Trumbull County Police, Fire Department and Hazmat..... 911

SEE REVERSE FOR FIRST RESPONDER REPORTING FORM

# RVAAP Load Line 12 Remedial Design Site and Erosion Control Inspection Form

Date: Time	e:
Weather: (include days since last rainfall and amount in inches of last rainfall	1)
SILT FENCE INSPECTION Are silt fences intact? If no, describe status when arrived at site and maintenance required for silt fer	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 maintenance required:	Yes No
SITE INSPECTION  Is the site in good shape (e.g., no debris)?  If no, describe status when arrived at site and maintenance required to improve	Yes No
If site requires additional actions beyond what can be done during the inspection immediately to coordinate site improvements.	ion, please contact the Project Manager
ADDITIONAL COMMENTS	
Recorded By:Date:	<b>.</b>
QC Checked By: Date	<b>:</b>

## 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

## RVAAP Load Line 12 Remedial Design Health and Safety Plan Signature Log

I have reviewed and understand the contents of the Health and Safety Plan. I hereby agree to comply with all the requirements outlined herein.

Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	
Signature:	Date:
Print Name:	
Signature:	Date:
Print Name:	
Signature:	Date:
Print Name:	
Signature:	Date:
Print Name:	
Signature:	Date:
Print Name:	Agency:
Signature:	Date:
Print Name:	Agency:

# RVAAP Load Line 12 Remedial Design Site Restoration Inspection Form

Date/Time:	Completed by:	
SITE RESTORATION INSPECTION Final grading completed and vegetative layer installed? Temporary SWP3 controls removed? Final SWP3 controls installed? Were all disturbed areas seeded/hydroseeded? Is seed established? (70% coverage is required) Is silt fencing intact? Are there signs of erosion (cracks/ruts/gullies/minimal gare there any areas of the site that are disturbed, but will list Have all dormant, disturbed areas been temporarily stab Have disturbed areas outside the silt fence been seeded thave soil stockpiles that will sit for over 21 days been so Has seed or mulch blown away? If so, repair.	kely lie dormant for over 21 days? ilized in their entireties? or mulched?	Yes
Maintenance required for above issues:		

# RVAAP Load Line 12 Remedial Design Truck Inspection Form

Date/Time:	Completed by:
Truck/License Number:	Trucking Company:
Type of Load Hazardous Waste Soil or Non-ha	zardous 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 delight of the learned of all delight of the learned of th	ebris? Yes 🗌 No
	v
Is the truck covered?	Yes No
Is waste manifest (or shipping papers) completed a	nd in the truck? Yes ☐ No☐
Comments:	

## **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

October 1, 2009

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#### ACRONYMS AND ABBREVIATIONS

AOC Area of Concern

BGS Below Ground Surface

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. ArmyU.S. Department of ArmyUSACEU.S. Army Corps of Engineers

UXO Unexploded Ordnance

#### 1.0 BACKGROUND

#### 1.1 GENERAL FACILITY DESCRIPTION

When the Ravenna Army Ammunition Plant (RVAAP) Installation Restoration Program (IRP) began in 1989, the RVAAP was identified as a 21,419-acre installation. The property boundary was resurveyed by the Ohio Army National Guard (OHARNG) over a two year period (2002 and 2003) and the actual 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 have been transferred to the National Guard Bureau (NGB) and subsequently licensed to the OHARNG for use as a military training site – Camp Ravenna Joint Military Training Center (Camp Ravenna). The current RVAAP consists of 1,280 acres in various parcels throughout the OHARNG Camp Ravenna.

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

The entire 21,683-acre parcel was an industrial facility that was government-owned and contractor-operated 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.

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.

#### 1.2 LOAD LINE 12 DESCRIPTION

Load Line 12 (LL12), designated as AOC RVAAP-12, covers about 80 acres in the southeastern 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 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 AOC contained former production areas. The eastern half was previously cleared, but did not contain any known production facilities. The Remedial Investigations (RIs) also identified an area immediately north of the AOC (informally termed the Team Track Area) that was apparently used for offloading and staging of materials used in 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. Department of Army (U.S. Army) terminated the lease early due to environmental concerns related to air emissions and wastewater discharges to Cobbs Ponds.

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.

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 ft<sup>3</sup> 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.

The following investigations have been completed for LL12:

- 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);

- Phase II Remedial Investigation Report for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio (USACE 2004);
- Characterization of 14 Areas of Concern at the Ravenna Army Ammunition Plant Ravenna, Ohio (MKM 2007); and
- Phase II Remedial Investigation Supplemental Report for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio (USACE 2005a).

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.

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 *Feasibility Study for Load Line 12 (USACE 2006)*.

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.

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:

- Clearing of vegetation;
- Excavation of contaminated soil above clean up goals (CUGs) to a depth of 4 ft below ground surface (BGS);
- Handling and disposal of contaminated soil (above remedial goals) at an approved off-site facility;
- Confirmatory sampling after excavation;
- Restoration of excavated areas by backfilling with clean fill material per the *Facility-Wide* Sampling and Analysis Plan for Environmental Investigations at the RVAAP (USACE 2001);

- Implementation of LUCs (e.g., security procedures, installation perimeter fencing, markers, and operational administrative controls) at LL12; and
- Conducting 5-year reviews and monitoring of the performance of the selected remedy (i.e., monitoring of the LUC effectiveness) as described in the LL12 Record of Decision (ROD) (USACE 2009).

In addition, the selected alternative includes inspection and maintenance of the RVAAP/Camp Ravenna perimeter fence.

#### 1.3 PURPOSE

The purpose of this LUC RD is to outline a process for the implementation and maintenance of LUCs as part of the remedial action at LL12. This LUC RD provides LUC performance objectives, the LUCs to be used, and the LUC implementation actions.

#### 1.4 EXPOSURE ASSUMPTIONS AND ANTICIPATED LAND USE

This baseline human health risk assessment (HHRA) summary documents the potential health risks to humans resulting from exposure to contamination within LL12 at RVAAP if no remedial action was taken. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action. Section G.1 of the ROD summarizes the results of the baseline risk assessment presented in the Feasibility Study (FS) for LL12 at RVAAP (USACE 2006).

The RVAAP will be retained by the U.S. government (i.e., a federal facility) for use by the OHARNG for military training. The HHRA identified the National Guard Trainee as the representative receptor for the reasonably anticipated future land use. Three other receptors (Security Guard/Maintenance Worker, Fire/Dust Suppression Worker, and Hunter/Trapper) were also considered under the planned OHARNG future use. The National Guard Trainee is the most sensitive receptor under planned future land use. Potential exposures for the remaining three receptors are less than the National Guard Trainee and clean-up goals for the National Guard Trainee are also protective for these other receptors. The Resident Subsistence Farmer (adult and child) provided a full comparative range of risks for development and analysis of remedial alternatives. Risk information for other receptors is located in the HHRA (USACE 2005b) and FS (USACE 2006).

The intended future land use for LL12 is for National Guard training. Specifically, this area will be used for mounted training. Maneuver damage may occur up to 4 ft BGS. This future use is inclusive of these receptor types: Trainee, Security Guard/Maintenance Worker, Hunter/Trapper, and Fire/Dust Suppression Worker.

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

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 receptors to address a range of possible future land uses.

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

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

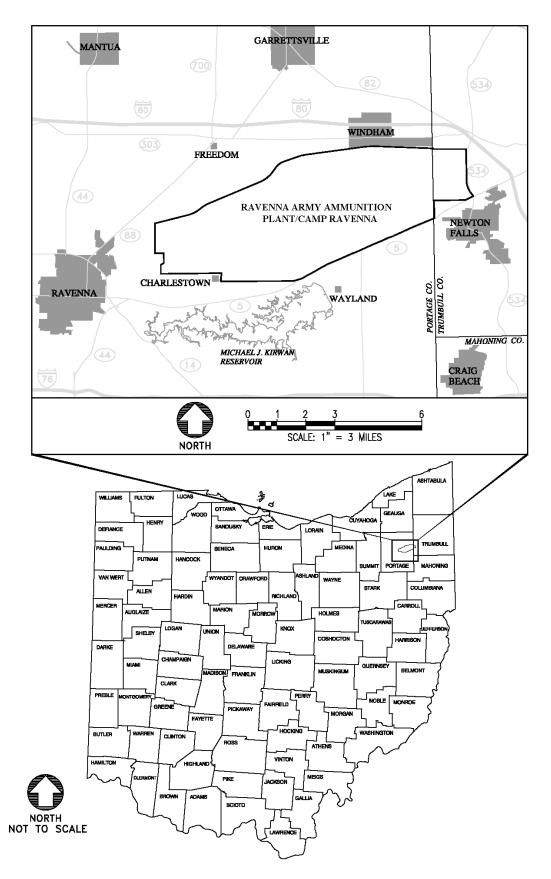


Figure 1-1. General Location and Orientation of the RVAAP/ Camp Ravenna



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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## 2.0 LAND USE CONTROL OBJECTIVES

The U.S. Army will implement LUCs to achieve the performance objectives listed below for LL12.

- 1.) Maintain the Camp Ravenna perimeter fence.
- 2.) Restrict future land use to National Guard mounted training.
- 3.) Maintain LUC training program.
- 4.) Limit activities to tracked and wheeled operations that are consistent National Guard mounted training scenario and other essential security, safety, and natural resources management activities.
- 5.) Prohibit digging beyond 4 ft BGS at LL12.

Figures 1-2 and 1-3 depict the LUC boundaries for LL12.

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#### 3.0 LAND USE CONTROLS

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

#### 3.1 LAND RESTRICTIONS AT LOAD LINE 12

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.

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

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.

## 3.2 DISTURBANCE RESTRICTIONS

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

- 1.) Ground surface repairs, as required, resulting from maneuver damage; and
- 2.) Routine maintenance of the roads, ditches and culverts.

## 4.0 IMPLEMENTATION ACTIONS

The U.S. Army shall perform the following implementation actions to ensure that the LUC objectives are met:

- 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 to identify the areas where the LUC applies.
- Incorporate environmental overlay and appropriate Ohio EPA notice procedures into the Property Management Plan (PMP).
- 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 maneuvering damage.
- Through the PMP, maintain the Camp Ravenna perimeter fence and limit activities at LL12
  to tracked and wheeled operations that are consistent with the National Guard mounted
  training scenario and other essential security, safety, and natural resource management
  activities.

If additional LUC-related RD documents are identified or prepared for proposed inclusion in the LL12 RD, the U.S. Army shall, upon review and approval by Ohio EPA, incorporate those documents as appropriate into the PMP, and provide copies to Ohio EPA.

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## 5.0 Modification or Termination of LUCs

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

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

The U.S. Army shall not, without Ohio EPA approval, terminate a LUC. The decision to terminate LUCs will be documented consistent with the National Oil and Hazardous Substances Pollution Contingency Plan process for post-ROD changes.

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#### 6.0 MONITORING AND REPORTING

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.

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 place and are effective.

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

As part of the CERCLA Section 121(c) 5-Year remedy review process, the U.S. Army shall prepare a report evaluating the continued effectiveness of the remedy, including effectiveness of the LUCs and an assessment of whether there is a need to modify the LUCs. The U.S. Army will verify whether the LUCs continue to be properly documented and maintained. Each remedy review will evaluate whether conditions have changed due to contaminant attenuation, migration or other factors such as land use. If risk levels have changed since initial LUC implementation, LUC modification will be considered, which may include a change in monitoring frequency.

### 8.0 LUC ENFORCEMENT

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 writing as soon as practicable but no later than ten (10) days after discovery, and will include a written description of the inconsistent land use. Within ten (10) days after such notification, the U.S. Army will provide Ohio EPA with information regarding what efforts or measures have or will be taken to address the inconsistent land use.

The U.S. Army will work with Ohio EPA and if applicable, transferees/lessees of LL12 or any portion thereof, to take appropriate action to enforce the LUCs or maintain remedy integrity. The U.S. Army may take immediate action pursuant to its CERCLA authorities to prevent any perceived risk(s) to human health or the environment. Any breach of the LUCs will be reported to the appropriate civil authorities. Potential response measures include informal resolution with the owner or violator, and the institution of judicial action under State property law or CERCLA.

### 9.0 LEASES AND PROPERTY TRANSFERS

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.

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

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.

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.

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

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.

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

### 10.0 RESPONSIBILITIES OF SUBSEQUENT OWNERS/ LESSEES

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

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

### 11.0 REFERENCES

- E2M (Engineering-Environmental Management, Inc.) 2008. Final Site Inspection Report for the Ravenna Army Ammunition Plant, Ohio. Military Munitions Response Program Site Inspection, Munitions Response Sites. May 2008.
- MKM (MKM Engineers, Inc.) 2007. Characterization of 14 Areas of Concern at Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2007.
- 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.
- USACE (U.S. Army Corps of Engineers) 1996. Preliminary Assessment for the Characterization of Areas of Contamination at the Ravenna Army Ammunition Plant, Ravenna, Ohio. February 1996.
- USACE 1998. 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. February 1998.
- USACE 2001. Final Facility-Wide Sampling and Analysis Plan for Environmental Investigations at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2001.
- USACE 2004. Phase II Remedial Investigation Report for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2004.
- USACE 2005a. Phase II Remedial Investigation Supplemental Report for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio. December 2005.
- USACE 2005b. Ravenna Army Ammunition Plant Facility-Wide Human Health Risk Assessor Manual: Amendment 1. November 2005.
- USACE 2006. Feasibility Study for Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2006.
- USACE 2009. Record of Decision for Soil and Dry Sediment at the RVAAP-12 Load Line 12 at the Ravenna Army Ammunition Plant, Ravenna, Ohio. March 2009.

## DRAFT REMEDIAL DESIGN FOR THE RVAAP-12 LOAD LINE 12 AT THE RAVENNA ARMY AMMUNITION PLANT, RAVENNA OHIO COMMENT RESPONSE TABLE

**September 16, 2009** 

Comment Number	Page or Sheet & Line No.	New Page or Sheet	Comment	Recommendation	Response
			Ohio	EPA (Todd R. Fisher)	
O-1	Contractor Statement of Independent Review	SF 298	On this page, Jed Thomas is listed as an Independent Technical Review Team Leader, however, he is also listed as the principal author on the Report Documentation Page. If he is the principal author, he should not be a member of the Independent Technical Review Team	Please explain and/or make the appropriate changes to the text.	Agree. Tia Rutledge was the principle author of the Draft Load Line 12 Remedial Design and should have been listed as such on the Reporting Documentation Page. This change will be reflected in the Final RD.
O-2	Page 2-2 Lines 17-19	Page 2-2	The text mentions the Facility-Wide Quality Assurance Protection Plan but there is no reference given.	Please provide reference as to where the Facility-Wide Quality Assurance Protection Plan can be found	Clarification and agree. The Facility-Wide Quality Assurance Project Plan is part II of the Facility-Wide Sampling and Analysis Plan. (USACE 2001a) on the reference list.  The text will be revised as follows: "The SAIC QA/QC Officer coordinates with the SAIC Construction Manager to ensure the requirements of the RD CQAP and Facility-Wide Quality Assurance Protection Project Plan (QAPP), Part II of the Facility-Wide SAP (USACE 2001a), are achieved and ensures inspections are performed in accordance with both plans.
O-3	Page 5-3 Lines 6-8	Page 5-3	This is the first use of the acronym ORAM and should be spelled out completely.	Please make the appropriate changes to the text.	Agree. ORAM will be spelled out completely.

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### DRAFT REMEDIAL DESIGN FOR THE RVAAP-12 LOAD LINE 12 AT THE RAVENNA ARMY AMMUNITION PLANT, RAVENNA OHIO COMMENT RESPONSE TABLE

### **September 16, 2009**

P	age	2	of	5

Comment Number	Page or Sheet & Line No.	New Page or Sheet	Comment	Recommendation	Response
O-4	Page 7-1 Lines 19-21	Page 7-1	The text states that remote sampling will be accomplished either by use of a decontaminated stainless-steel attachment to the excavator, or by using extension rods on a soil probe.	Please provide more information (description, diagram, etc.) on the stainless-steel attachment that may be used with the excavator. Is there one commercially available?	Clarification. At this time SAIC intends to conduct sampling by using an extension rod. The reference to the stainless-steel attachment to the excavator will be removed.
O-5	Page 9-6 Lines 18-22	Page 9-6	The text states that contaminated sediment will be loaded into on-road haul trucks and transported by licensed waste haulers to RVAAP and SAIC approved licensed off-site disposal facilities. The text further states that all transportation requirements, including proper labeling, placarding, and weight limits will be followed. The text does not state that the trucks will be covered and inspected for gross contamination before it leaves the facility.	Please revise the text accordingly.	Clarification and agree. The text regarding covering the trucks and inspecting for gross contamination is on page 6-3 lines 20-26.  The text will be revised as follows:  "Contaminated dry sediment loaded into on-road haul trucks will be transported by licensed waste haulers to RVAAP and SAIC approved licensed off-site disposal facilities as specified in Section 6.3.2. All transportation requirements, including proper labeling, placarding, and weight limits will be followed. All manifests, shipping documents, and disposal facility approval letters will be provided to SAIC and incorporated into the Construction Report."
O-6	Attachment A Page 2-3 Lines 20-23	Attachment A Page 2-3	There is no mention of drowning as a hazard.	Please add drowning as a potential hazard to this paragraph	Agree. "drowning" will be added to the listed hazards.

### DRAFT REMEDIAL DESIGN FOR THE RVAAP-12 LOAD LINE 12 AT THE RAVENNA ARMY AMMUNITION PLANT, RAVENNA OHIO COMMENT RESPONSE TABLE

**September 16, 2009** 

Comment Number	Page or Sheet & Line No.	New Page or Sheet	Comment	Recommendation	Response
O-7	Attachment B General	Cross- checked Main text and Attachments	A Storm Water Pollution Prevention Plan (SWP3) Checklist for Construction Activities is available on the agency website. Were elements of this checklist used when developing the SWP3?	Please consult http://www.epa.ohio.gov/dsw/storm/co nstruction_index.aspx for additional information and resources when dealing with construction storm water issues.	Clarification. SAIC prepared the SWPPP referencing the requirements within the NPDES permit as well as the ODNR Rainwater and Land Development Standards available on-line. SAIC will cross check the Construction Activities Form with the RD (e.g., SWPPP, Construction Forms, Drawings, etc)
O-8	Attachment C Drawing C- 7 Legend	Attachment C Drawing C-7 Legend	The Legend depicts monitoring wells as filled in green circles and the straw check dam as staggered blocks on top of each other. These symbols cannot be located on the cross section or plan view.	If these symbols are not used in the drawing, then they should be removed.	Clarification. The straw check dam is located by drawing detail callout 3/C-8.  Agree. Monitoring wells will be added to the drawing. The symbol will remain in the legend.
O-9	Attachment C Drawing C- 8 Legend	Attachment C Drawing C-8 Legend	Drawing C-8, Load Line 12 Remedial Design Construction Details is missing a Legend	Please add a legend to this figure.	Agree. A drawing legend will be added to Drawing C-8.
O-10	Attachment E Page 2-1 Title	Attachment E Page 2-1 Title and TOC	The title heading on this page is "2.0 Land Use Control Object." The title heading should be "2.0 Land Use Control Objectives."	Please make the appropriate changes to the text.	Agree. Section 2.0 title heading will be revised as recommended.

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# DRAFT REMEDIAL DESIGN FOR THE RVAAP-12 LOAD LINE 12 AT THE RAVENNA ARMY AMMUNITION PLANT, RAVENNA OHIO COMMENT RESPONSE TABLE September 16, 2009

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Comment Number	Page or Sheet & Line No.	New Page or Sheet	Comment	Recommendation	Response			
	Camp Ravenna (Katie Elgin)							
CR-1	Pg 1-4, Line 34	Pg 1-4	"The US Army intends to transfer LL12 to the NGB on remedial actions are complete." Here it sounds like NGB is not part of the Army. This is an inter-Army transfer. Revised text: "LL12 will be transferred to NGB once remedial actions are complete."		Agree. Text will be revised as recommended.			
CR-2	Pg 2-3, Line 27	Pg 2-3	"Load Line 12 was designated as a No Further Action (NFA) AOC in the Site Inspection Report for the Munitions Response" Under the MMRP program, cleanup sites are referred to as MRSs. Revised text: "The Load Line 12 MRS was identified as No Further Action (NFA) in the Site Inspection"		Agree. Text will be revised as recommended.			

### DRAFT REMEDIAL DESIGN FOR THE RVAAP-12 LOAD LINE 12 AT THE RAVENNA ARMY AMMUNITION PLANT, RAVENNA OHIO COMMENT RESPONSE TABLE

**September 16, 2009** 

Page 5 of 5

Comment Number	Page or Sheet & Line No.	New Page or Sheet	Comment	Recommendation	Response
CR-3	Pg 10-3, Line 15	Pg 10-3	"The SAIC Construction Manager will ensure the spill is reported to Camp Ravenna Operations and RVAAP Army Staff as well ensure the incident is documented on a Camp Ravenna Spill Incident Reporting Form." Please note that LL12 is BRAC property. There is no requirement to notify the OHARNG of a spill if it is on LL12. If the spill is on the way to LL12 and falls on OHARNG property, then we must be notified.		Agree. The text will be revised as follows: "The SAIC Construction Manager will ensure the spill is reported to RVAAP Army Staff. and Should the spill occur on OHARNG property, the SAIC Construction Manager will notify Camp Ravenna Operations and RVAAP Army Staff as well ensure the incident is documented on a Camp Ravenna Spill Incident Reporting Form."
CR-4	Pg 13-1, Table 13-1	Attach A Pg 13-1	Please change the number for Camp Ravenna Range Control from '6793' to '6041'.		Agree. The number will be changed as recommended.
CR-5	Attachment E LUCs for LL12 Soil and Dry Sediment	N/A	Please note that based on recent discussions by the restoration team regarding LUCs, this section is likely to change (i.e. revised LUC boundaries, mapping of boundaries, text, etc.) However, it is too early to anticipate all changes needed. Therefore, please note that I did not review this section as it will be reviewed at a later date.		Comment noted.