

DISPOSITION FORM

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REFERENCE OR OFFICE SYMBOL

SUBJECT

AGOH-QM

Plum Brook Station Red Water Issue - Meeting with Ohio EPA and Follow-up with GSA

TO COL Hertzler

FROM Mark Gibson

DATE 19 March 84

CMT 1

1. On Tuesday, 13 March 1984, a meeting was held with representatives of the Ohio Environmental Protection Agency to discuss the Red Water Issue at Lewis Research Center, NASA, Plum Brook Station.

2. Attendees were as follows:

Mark A. Gibson	Adjutant General's Department
Stephanie M. Steve	Adjutant General's Department
Ben Pfefferle	Ohio EPA Legal Department
Roger Hannahs	Ohio EPA DHMM-Co
Mark Besel	Ohio EPA DHMM-Co
Katerine Wilson	Ohio EPA NWDO
Kevin Clauss	Ohio EPA NWDO

3. A number of topics were discussed, including but not limited to; historical considerations, pertinent regulations, site layout, surrounding conditions, recent laboratory analysis of collected samples and future actions. Of the topics discussed, the following are the most important.

a. The Red Water Ponds are not regulated under the Resource Conservation and Recovery Act (RCRA) and laboratory analysis for the characteristics for reactivity would not have to be undertaken.

b. If a regulation must be cited, section 6III of the Ohio Revised Code would be most appropriate.

c. The OEPA could not issue a statement that the ponds do not constitute a possible hazard with regard to the existing data.

d. An environmental assessment should be undertaken if a letter from the OEPA is still required before taking possession of the land.

4. With the above in mind, GSA was contacted to again discuss a DACA License (99 years) instead of direct sale or donation of the land. This approach was taken because of the possible expense of the environmental assessment (extensive water analysis), and the fact that we don't want to be the land owner (responsible party) without a "clean bill of health" from the EPA. The response from GSA was that a DACA License would only be undertaken after all alternatives are exhausted. In addition, there was mention that GSA might have funds to help with the assessment depending on the cost. To date, the strategy for acquiring Plum Brook is as follows:

a. A letter is forthcoming from the OEPA which will outline exactly what they want in terms of further environmental studies.

b. Upon receipt of the OEPA's request, three consultants will be contacted to submit bids on the environmental study.

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c. Once the bid packages are in, they will be forwarded with the letter from OEPA to GSA for review.

d. If GSA has funding available for the studies, the low bidder will be identified and given notice to proceed. If funding is not available, GSA will again be asked to consider a DACA License.


MARK A. GIBSON
Environmentalist

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