



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EP-R-3
Rec'd at Site 9or 10 Jun 98 JB

D-8J

REPLY TO THE ATTENTION OF:

Keith Peacock
Environmental Manager
NASA Plumbrook Station
6100 Columbus Avenue
Sandusky, OH 44870

Re: Visual Site Inspection (VSI)
NASA Lewis Research Ctr. (LERC)
Plum Brook Station
Sandusky, Ohio
OH3800015379

Dear Mr. Peacock,

The United States Environmental Protection Agency (U.S. EPA) Region 5 has requested TechLaw, Inc., U.S. EPA's RCRA Enforcement, Permitting and Assessment Contractor, to conduct a Preliminary Assessment/Visual Site Inspection (PA/VSI) at the NASA Lewis Research Center (LERC) Plum Brook Station facility. Under the 1984 Hazardous and Solid Waste Amendments (HSWA), a PA/VSI is required of the NASA Plum Brook Station facility. For the purposes of this assessment, Metcalf & Eddy, a TechLaw subcontractor, will conduct the site visit. The assessment requires the identification and systematic review of all solid waste streams at the facility in order to determine whether releases of hazardous wastes or hazardous constituents have occurred or are occurring at the site which require further investigation. This analysis will provide information to establish priorities for subsequent remedial investigations.

An integral part of this assessment is a visual site inspection (VSI) of your facility to verify the location of all "Solid Waste Management Units" (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. No samples will be taken during this site visit.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. This site visit is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of each SWMU/AOC are to be taken to document the condition of each unit at the facility and the waste management procedures used.

The VSI has been scheduled for Wednesday and Thursday, June 17 and 18, 1998. The Metcalf & Eddy inspection personnel may be accompanied by State of Ohio representatives. Your cooperation in admitting them and assisting them while on site is appreciated.

In preparation for the VSI, inspection personnel are required to identify any potentially hazardous conditions likely to be encountered at the site during performance of the VSI and to prepare a safety plan to deal with the hazards, if necessary. You will be contacted by telephone in the near future by a Metcalf & Eddy representative to provide specific information on the level(s) of personal protection required and the materials handled in each area of your facility.

A copy of the proposed VSI agenda (Attachment I) is enclosed. Please review and gather the information requested in Attachment II, the information needs list, prior to the VSI. Should you have any questions regarding this letter, please contact me at (312) 886-0977 or Ms. Jodi Beck of Metcalf & Eddy at (614) 890-5501. Also, please contact me if you would like to request a copy of the PA/VSI report when completed.

Sincerely,



Gerald Phillips, EPA Region 5
Corrective Action Process Manager

Enclosure

cc: Ron Nabors, OEPA, Division of Hazardous Waste Management

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
NASA LEWIS RESEARCH CENTER
PLUM BROOK STATION
SANDUSKY, OHIO
EPA ID NO. OH3800015379

June 17 and 18, 1998

INSPECTION ORGANIZATION

Metcalf & Eddy personnel will form a two member team to perform a one to two-day inspection tour (as necessary). The team, in general, will inspect waste generation and disposal areas such as container storage areas, surface impoundments, waste piles, and release pathways for release of wastes into the environment. An interview with the facility staff will be performed to develop a better understanding of past waste disposal practices. Pertinent geologic information consisting of well logs, USGS topographic maps, plat and zoning maps and surrounding land use patterns will be reviewed. The team will concentrate on developing a better understanding of the vertical and horizontal alignments of any surface impoundments, container storage areas, and any other waste generation, treatment, storage, and disposal facilities. A review of the regional hydrogeology and site-specific data will be performed to make an assessment of depth to groundwater and its flow direction in the proximity of the Solid Waste Management Units.

The overall rationale of this inspection plan is to enable the team to trace waste streams from process through treatment and disposal. Some adjustments to the agenda will more than likely be necessary to accommodate facility staff, geographical location of units and/or operational constraints.

Preliminary information needs have been submitted as Attachment II to aid the NASA Plum Brook Station facility in preparing for the site visit. These issues will be resolved in an introductory meeting during the VSI. A more efficient agenda may be arranged at that time to ensure that all SWMUs/AOCs identified will be inspected.

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LIST OF POTENTIAL OUs/SWMUs AND AOCs

<u>OU/SWMU</u>	<u>LIST OF POTENTIAL OU/SWMUs</u>
1.	TNT Areas - A, B, C (spills associated with ordnance production and D&D efforts)
2.	Red Water Ponds - West Area Red Water Ponds (2 each), Pentolite Road Red Water Pond (includes spoils area)
3.	Underground Wastewater Flumes (unidentified bypass lines installed during ordnance production)
4.	Burning Grounds (2 on Snake Road, 1 off Taylor Road, 1 west of raw water pond, 1 east of Guard House G-8, 1 on Fox Road)
5.	Waste Lagoons in Pentolite Area
6.	Fly Ash Spoil Piles
8.	UST Removal Areas - Maint. Area (7121, 7131, 7132), Pump Station (8133), PBRF Service Equip. Bldg. (1131), SPF Bldg. (1411)
10.	SPF Rubble Pile
11.	Disposal Area 1B
12.	Disposal Area 2
14.	Lime Sludge Disposal Area

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OU/AOCs

POTENTIAL OU/AOCs

- 7. Toluene Storage Tanks
- 9. Asbestos Contamination Area
- 13. Rail Car Unloading Area

WRAP-UP MEETING

Inspection team will meet with NASA Plum Brook personnel to conclude day's activities.

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7. Provide all groundwater monitoring data obtained to date (if applicable) from groundwater monitoring wells located on-site.
8. Provide information regarding the status of the facility. Is the facility closed or operating?
9. Provide status of SWMUs and AOCs identified in the VSI Agenda (see Table of OUs/SWMUs) and any other waste management units that exist or have existed in the past and have been removed or taken out of use.
10. Provide the following information for each of the SWMUs located within the OUs at the facility:
 - Location
 - Description of units (i.e. dimensions, materials of construction, etc.)
 - Period of operation
 - Wastes managed
 - Release controls
 - History of any releases
11. Provide a description and identify the location of all past and present underground storage tanks at the facility.
12. Provide all soil monitoring data obtained to date (if applicable).