



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402
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George V. Voinovich
Governor

RE: NASA Plum Brook Station
Erie County
MSL # 322-0552

March 24, 1994

Mr. Doug Mullendore
U.S. Army Corps of Engineers
Nashville District
ATTN: CE ORNER - H (Mullendore)
P.O. Box 1070
Nashville, Tennessee 37202-1070

Dear Mr. Mullendore:

This is in response to your phone call March 21, 1994, in which we discussed your plans to contract out an Environmental Investigation covering seven Formerly Utilized Defense Sites (FUDS) located on the NASA - Plum Brook Station property.

You specifically requested guidance on the number of background samples required, number and placement of groundwater monitoring wells and the analytical methods which would be necessary to meet data quality objectives for your use in making risk-assessment based "no further action" decisions on use of the shallow aquifer.

You indicated that having this type of guidance would be a benefit prior to accepting a work plan from a contractor for the investigation. This agency cannot provide this type of site-specific guidance or approve planned activities unless we are bound under enforceable orders. As we discussed, the State of Ohio is endeavoring to enter such an order to oversee a facility-wide remedial investigation and clean-up of the NASA - Plum Brook Station.

I have enclosed list of guidances to which we would expect an investigation to conform, plus copies of Ohio's How Clean is Clean and Background Guidance policies, items #1 and #2 on that list. Answers to your other specific questions might be found in guidances numbered 12 and 22 on the list. Beyond this, Ohio EPA will not be able to address your site-specific concerns or render any reviews until we have a formal arrangement provided by an order.

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If you need further information, I suggest you contact either Ellen Leidner, Assistant Attorney General, Environmental Enforcement Section at (614) 466-2766 or myself at (419) 352-8461.

Sincerely,



Christina A. Baker
Group Leader
Division of Emergency and Remedial Response

/jks

Enclosure

pc: Amy Bower, NASA Plum Brook Station
David Kaplan, Esq., U.S. DOJ
Ellen Leidner, AGO
Tom Harcarik, DERR- CO
NWDO File

OHIO EPA AND U.S. EPA GUIDANCE DOCUMENTS

1. How Clean is Clean, Final, Ohio EPA, Division of Emergency and Remedial Response, Policy No. DERR-00-RR-009, July 26, 1991
2. Background Guidance, Final, Ohio EPA, Division of Emergency and Remedial Response, July 26, 1991
- * 3. Guidance for Conducting Remedial Investigation and Feasibility Studies under CERCLA, Interim Final, OSWER 9355.3-01, EPA/540/G-89/004, October 1988
- * 4. Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites, OSWER Directive 9355.3-11, EPA/540/P-91/001, February 1991
5. Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual (Part A), Interim Final, EPA/540/1-89/002, December 1989
6. Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual (Part B), "Development of Risk-based Preliminary Remediation Goals," OSWER Directive 9285.7-01B, December 1991, Interim
7. Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual (Part C), "Risk Evaluation of Remedial Alternatives," OSWER Directive 9285.7-01C, December 1991, Interim
8. Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual, Supplemental Guidance: "Standard Default Exposure Factors," OSWER Directive 9285.6-03, March 1991, interim final
9. Risk Assessment Guidance for Superfund: Volume II - Environmental Evaluation Manual, OSWER Directive 9285.7-01, EPA/540/1-89/001A, March 1989, interim final
10. Superfund Exposure Assessment Manual, OSWER Directive 9285.5-1, EPA/540/1-88/001, April 1988
11. Exposure Factors Handbook, EPA/600/8-89/043, March 1990
12. RCRA Ground Water Monitoring Technical Enforcement Guidance Document (TEGD), OSWER Directive 9950.1, September 1986

13. Guidance for Remedial Actions for Contaminated Ground Water at Superfund Sites, OSWER Directive 9283.1-2, EPA/540/G-88/003, December 1988, interim final
14. Leachate Plume Management, EPA/540/2-85/004, November 1985
15. Data Quality Objectives for Remedial Response Activities, Volume I - Example Scenario, OSWER Directive 9355.0-7B, EPA/540/G-87/004, March 1987
- ** 16. Superfund Remedial Design and Remedial Action Guidance, OSWER 9355.0-4A, June 1986
- * 17. Ecological Assessments of Hazardous Wastes Sites: A Field and Laboratory Reference, EPA/600/3-89/013, March 1989
18. Guidelines and Specifications for Preparing Quality Assurance Project Plans, Ohio EPA, Division of Emergency and Remedial Response, Policy No. DERR-00-RR-008, March 1990
19. CERCLA Compliance with Other Laws Manual - Part I, OSWER Directive 9234.1-01, EPA/540/G-89/006, August 1988, interim final
20. CERCLA Compliance with Other Laws Manual - Part II, OSWER 9234.1-01, EPA/540/G-89/006, August 1988, interim final
21. U.S. EPA Integrated Risk Information System (IRIS) Data Base
22. Guidance for Data Usability in Risk Assessment, OSWER Directive 9285.7-05, EPA/540/G-90/008, October 1990, interim final
23. U.S. EPA Health Effects Assessment Summary Tables, Office of Emergency & Remedial Response, published annually
- * 24. A Compendium of Technologies Used in the Treatment of Hazardous Wastes, EPA/625/8-87/014, September 1987
25. Guide for Conducting Treatability Studies Under CERCLA, EPA/540/2-89/058, December 1989, interim final
26. Guide for Conducting Treatability Studies Under CERCLA: Aerobic

- Biodegradation Remedy Screening, EPA/540/2-91/013A, July 1991, interim guidance
27. Guide for Conducting Treatability Studies Under CERCLA: Soil Vapor Extraction, EPA/540/2-91/019A, September 1991, interim guidance
 28. Handbook on In Situ Treatment of Hazardous Waste-Contaminated Soils, EPA/540/2-90/002, January 1990,
 29. Handbook for Stabilization/Solidification of Hazardous Wastes, EPA/540/2-86/001, June 1986
 30. Stabilization/Solidification of CERCLA and RCRA Wastes - Physical Tests, Chemical Testing Procedures, Technology Screening and Field Activities, EPA/625/6-89/022, May 1989
 31. Technical Guidance Document: Final Covers on Hazardous Waste Landfills and Surface Impoundments, EPA/530-SW-89-047, July 1989
 - ** 32. Technical Guidance Document: Construction Quality Assurance for Hazardous Waste Land Disposal Facilities, EPA/530-SW-86-031, October 1986
 33. Seminar Publication - Requirements for Hazardous Waste Landfill Design, Construction, and Closure, EPA/625/4-89/022, August 1989
 - ** 34. Technical Guidance Document: Inspection Techniques for the Fabrication of Geomembrane Field Seams, EPA/530/SW-91/051, May 1991
 35. Technical Guidance for Corrective Measures - Subsurface Gas, EPA/530-SW-88-023, March 1985
 - ** 36. Handbook - Guidance on Setting Permit Conditions and Reporting Trial Burn Results - Volume II of the Hazardous Waste Incineration Guidance Series, EPA/625/6-89/019, January 1989
 - ** 37. Handbook - Hazardous Waste Incineration Measurement Guidance Manual - Volume III of the Hazardous Waste Incineration Guidance Series, EPA/625/6-89/021, June 1989