



State of Ohio Environmental Protection Agency

Northwest District Office

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George V. Voinovich
Governor

RE: U.S. NASA PLUM BROOK
ERIE COUNTY
OHIO I.D#: 322-0552
G-8 BURNING GROUND

January 22, 1997

International Technology Corporation
Mr. Don Burton
312 Directors Drive
Knoxville, TN 37923-4799

Dear Mr. Burton;

The Ohio Environmental Protection Agency (EPA), Division of Emergency and Remedial Response (DERR), has reviewed the document titled "Report for the Site Investigation of the G-8 Burning Ground at the Former Plum Brook Ordnance Works, Sandusky, Ohio." This document was submitted to the Ohio EPA by the International Technology (IT) Corporation, November 1996, for review and comments. Ohio EPA, DERR is providing the following comments.

General Comment: Ohio EPA, DERR feels that the report of findings is inadequate to conclude that the G-8 burning area has been investigated. Approximately three fourths of the suspected 2-acre G-8 burning ground was not investigated. Please indicate if you plan to conduct any further investigation of the G-8 burning area.

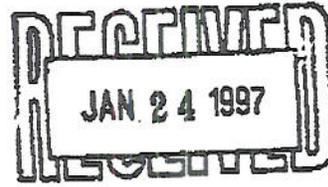
Part 2.0 Field Activities, Page 2-1, Section 2.1 Screening Geophysical Survey: Figure 2-1 is missing.

Part 5.0 Conclusions and Recommendations, Page 5-2, Section 5.1.2 Subsurface soil: The last sentence in the third bullet discusses sediment samples. Please remove this sentence.

Please feel free to contact me with any concerns or questions that may arise. I can be reached at (419) 373-3147.

Sincerely,

Ronald E. Nabors
Site Coordinator
Division of Emergency and Remedial Response
/csr
pc: NWDO File



**Response to Ohio EPA Comments
on the Draft Report for the Site Investigation at the G-8 Burning Ground,
Former Plum Brook Ordnance Works, Sandusky, Ohio**

Reference: *Letter dated January 22, 1997 from Mr. Ronald Nabors, Northwest District Office, OEPA to Don Burton, IT Corporation.*

Comment 1 : Ohio EPA, DERR feels that the report of findings is inadequate to conclude that the G-8 burning area has been investigated. Approximately three fourths of the suspected 2-acre G-8 burning ground was not investigated. Please indicate if you plan to conduct any further investigation of the G-8 burning area..

Response: *IT Corporation was tasked by U.S. Army Corps of Engineers to conduct a preliminary site investigation at the suspected G-8 burning ground which was believed to be located in a clearing at the corner of Campbell Street and Patrol Road. There was very little historical information as to where exactly this burning pit was located and how big it used to be. During the 1994 site inspection, MK Corporation estimated this area to be approximately 2 acres and described it as a clearing which runs east to west with a small ditch bordering the north side. MK provides no information in their report as how their estimate was made. During the 1994 record review by Dames & Moore and site reconnaissance activities in March 1994 and March 1995 by Dames & Moore and USACE personnel, the target site was found to be an open area surrounded by hardwood forest. During IT's investigation of the site in 1995, the clearing was much smaller than the 2 acres claimed by MK. It is likely that the real size of the burning ground was grossly overestimated. In fact, in addition to the screening geophysical survey in the clearing, the IT field geophysist conducted a walk-over of a much larger area surrounding the clearing and did not find any geophysical anomalies. After consulting with the USACE, the decision was made to survey and sample the full extent of the clearing area as observed in the field. The results indicated that no significant contamination was present in soil and sediment and additional investigation of this area is not warranted.*

The Sections 1.4 and 2.1 of the report have been revised to add more background information concerning the actual size of the G-8 burning ground and the likely overestimate of the site by previous investigations.

Comment 2: Part 2.0 Field Activities, Page 2-1, Section 2.1 Screening Geophysical Survey: Figure 2-1 is missing.

Response: *Figure 2-1 was inadvertently left out during reproduction. This figure is included in the final report.*

Comment 3: Part 5.0 Conclusions and Recommendations, Page 5-2, Section 5.1.2 Subsurface soil: The last sentence in the third bullet discusses sediment samples. Please remove this sentence.

Response: *The text has been revised to replace "sediment samples" with "soil samples". The conclusion remains unchanged, however.*