



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, LOUISVILLE
CORPS OF ENGINEERS
P.O. BOX 59
LOUISVILLE, KENTUCKY 40201-0059

June 27, 2000

Mr. Ronald E. Nabors
State of Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43402

RE: NASA Plum Brook Ordnance Works, Erie County, Ohio ID# 322-0552,
Lower Toluene Tanks Area

Dear Mr. Nabors,

The U.S. Army Corps of Engineers, Louisville District, Environmental Engineering Branch, has reviewed your Comments on the draft, "Limited Site Investigation, Quality Assurance Project Plan (QAPP)" and draft "Final Report" for the Lower Toluene Tanks Area at the former Plum Brook Ordnance Works, Sandusky, Ohio. Our responses to each of the comments are provided below:

Limited Site Investigation, Quality Assurance Project Plan

1. General Comment: The Ohio EPA, DERR, would prefer to receive the Quality Assurance Project Plan under separate cover and have it referenced in all site investigation Work Plan submittals.

Response: We apologize for not obtaining an OEPA, DERR preferred format to develop the Quality Assurance Project Plan (QAPP). We have prepared QAPP documents for projects in Illinois, Michigan and Ohio. The QAPP and associated FSP and DQO attachments were assembled for the Former Plum Brook Ordnance Works using the EPA Region 5 model QAPP, the format we typically use. We apologize for this inconvenience. If our office executes future phases of work for this Formerly Used Defense Site, we will incorporate the OEPA, DERR preferred format in preparing documents.

2. General Comment: The flow of the document is very confusing as it jumps back and forth between the entire Plum Brook Ordnance Works (PBOW) history and the history of the Lower Toluene Tank Area. Please create a Plum Brook Ordnance Works general history section and focus the remainder of the document on the area to be investigated.

Response: The QAPP will be edited accordingly.

3. Section 1.2.1 Facility Size and Borders: Please indicate the size and borders of the Lower Toluene Tank Area.

Response: The Lower Toluene Tank Area is approximately 4 acres. It is located in the southwestern portion of PBOW. The Tank Area is bordered to the south by the intersection of Patrol road and Taylor Road. The area is bordered to the east by abandoned railroad tracks running north and south. The remaining borders to the north and west are thick vegetative and forested areas. This information will be added to section 1.2.1.

4. Section 1.3 Past Data Collection Activities: Please Provide boring logs for the referenced wells as attached figures.

Response: The referenced boring logs will added to the figure section of the QAPP.

5. Section 1.5.1 Project Target parameters and Intended Data Usages: The Target Parameters for this investigation should include analysis for Lead and Semivolatile Organic Compounds (SVOCs). Historically, Department of defense (DOD) facilities utilized lead based paint for painting above ground storage tanks. SVOCs from the rail spur may have impacted the area as well. The Field Sampling Plan and Data Quality Objectives sections of this document should be revised to include these parameters as well.

Response: The primary objective for the limited site investigation was to determine if the toluene stored within the tanks had adversely impacted the site through spills and leaks. As of this writing, the sampling outlined in the Field Sampling Plan and DQOs has already been completed. This comment will be addressed further in the Final Report responses.

Final Report

1. Section 2.0, Previous Investigations, Page 5: The last sentence on page 5. When carried over to page 6, makes no sense. Please revise this section.

Response: The last sentence on page 5 should read, " The results of these analyses revealed no contamination in the soil and groundwater". The first sentence on page 6 should read, " These wells were then included in the site-wide groundwater study performed by IT Corporation". The text will be edited accordingly.

2. Section 3.3 Field Screening, Page 8: Photoionization is misspelled in the first sentence.

Response: The text will be edited accordingly.

3. Section 7.0 Summary and Conclusions, Page 11: The word "has" is misspelled in the second sentence of the second bullet.

Response: The text will be edited accordingly.

4. General comment: The Target Parameters for this investigation should have included analysis for Lead and Semivolatile Organic Compounds (SVOCs).

Response: The primary objective for the limited site investigation was to determine if the toluene stored within the tanks had adversely impacted the site through spills and leaks. The Corps of Engineers does agree that these two parameters should be investigated further. The recommendation section of the final report will be edited to reflect that further investigation is required to address the Lower Toluene Tank Area.

The U.S. Army Corps of Engineers is submitting these corrections and clarifications for the approval of the Ohio EPA, DERR. It is requested that your office reply within thirty days of the date of this letter. If you have any questions or concerns regarding the responses please contact me at (502) 582-5561.

Sincerely,


Darrell R. Davis
Environmental Scientist

cf: Richard Meadows, Huntington District