Ohio EPA
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PLEASE DELIVER THE FOLLOWING PAGES TO:

NAME: Linda Ingram Reid 8 Oct 98

COMPANY/DIVISION: ~~Ohio E~~ Army Corps of Engineers

FAX NUMBER: (615) 736-7676

FROM: Ron Nabors

DIVISION: Emergency and Remedial Response

TOTAL NUMBER OF PAGES INCLUDING COVER LETTER: 3

COMMENTS:

Faxed to M. Spangberg 8 Oct 98 LSI

IF THERE ARE ANY PROBLEMS, CALL OHIO EPA NWDO AT (419) 352-8461

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George V. Voinovich
Governor

October 8, 1998

RE: U.S. NASA PLUM BROOK
ERIE COUNTY
OHIO I.D#: 322-0552
TNT AREA B SITE INVESTIGATION

Department of the Army
Nashville District, Corps of Engineers
Ms. Linda S. Ingram
P.O. Box 1070
Nashville, TN 37202-1070

Dear Ms. Ingram;

The Ohio Environmental Protection Agency (EPA), Division of Emergency and Remedial Response (DERR), has reviewed the draft "Site-Specific Sampling and Analysis Plan" and draft "Site-Specific Safety and Health Plan" for the TNT Area B (TNTB) Remedial Investigation (RI) at the former Plum Brook Ordnance Works, Sandusky, Ohio. This document was submitted to the Ohio EPA by the Corps of Engineers, September 9, 1998 for review and comments. Ohio EPA, DERR is providing the following comments.

SITE-SPECIFIC SAFETY AND HEALTH PLAN

1. Part IX.2.0 Site Characterization and Analysis, Page IX-2, Section IX.2.2 General Site Information: Please include a map of the referenced TNT Area B.

2. Part IX.2.0 Site Characterization and Analysis, Section IX.2.2 General Site Information, Figure IX.1: Please identify U.S. Route 250 on the site and hospital location map.

3. Part IX.2.0 Site Characterization and Analysis, Section IX.2.2 General Site Information: Due to the size of the Plum Brook Ordnance Works facility please include a map identifying the most direct route on the facility from the TNT Area B to the Main Gate.

SITE-SPECIFIC SAMPLING AND ANALYSIS PLAN

1. The following is a brief summary of the soil sampling strategy to be performed at the TNTB in support of the RI. Please indicate if this summary is not consistent with planned activities.

   - one soil sample (0-1 foot below land surface (bls)) will be collected at 360 separate sampling locations within the 48-acre TNTB for screening of nitroaromatics using Ion Mobility Spectroscopy (IMS) methods;

   - up to 40 composite subsurface soil samples (2-10 feet bls, or to top of bedrock) will be collected based on the identification of hot-spots during the shallow soil screening process; hot spots will be selected based on analytical results which exceed USEPA Region IX preliminary remediation goals (PRGs) for nitroaromatics; subsurface samples will be screened for nitroaromatics using (IMS) methods; based upon the number of locations where composite soil samples exceed Region IX PRGs,

International Technology Corporation (ITC) will adjust their subsurface sampling strategy to determine the depth of contamination in as many areas as possible to maximize the use of the limited number of subsurface samples (40);

- 10 subsurface soil samples will be collected along the underground wastewater sewer lines and analyzed using (IMS) methods;

- ITC will collect a total of 40 shallow/subsurface soil samples for submittal to a fixed laboratory for confirmational analyses of nitroaromatics, and analyses of target compound list (TCL) VOCs, TCL SVOCs, target analyte list (TAL) metals (Ag, Al, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, K, Mg, Mn, Na, Ni, Pb, Sb, Ti, V, As, Hg, Se, and Zn), and PCBs;

- ITC will collect quality assurance/quality control (QA/QC) confirmational soil samples at a duplicate rate of 10% for those analyses listed in the item above; an appropriate number of matrix spike/matrix spike duplicates will also be collected; the Ohio EPA recommends that ITC collect equipment rinsate blanks (of e.g., hand augers, stainless steel spatulas, stainless steel split spoons) at a rate of 10% to ensure that decontamination efforts are adequate; ← Becky

- ITC will collect 2 QA/QC composite subsurface soil samples per day to confirm the repeatability of the IMS method.

Soil samples will be collected using standardized equipment and procedures to ensure sample integrity; the Ohio EPA recommends that hand augers be used for shallow soil sample collection and hollow-stem augering split spoon techniques be used for subsurface soil sample collection. The above tasks will be performed in an effort to determine the rate, extent, and concentrations of hazardous waste constituents in ground water, to provide an estimate of contaminated soil volume for a subsequent feasibility study (fs), and to support a human health and ecological risk assessment. No groundwater sampling

2. ITC will collect five surface water and five sediment samples from Ransom Brook which is south to north trending and is located directly north of the TNTB. Surface water and sediment samples will be analyzed for nitroaromatics, TCL VOCs, TCL SVOCs, TAL metals, and PCBs to characterize any contamination emanating from the TNTB. ITC will collect an appropriate number of duplicate and matrix spike/matrix spike duplicate QA/QC samples. The Ohio EPA recommends that ITC collect equipment rinsate blanks (of e.g., stainless steel spatulas, stainless steel bowls) at a rate of 10% to ensure that decontamination efforts are adequate.

Please incorporate these comments and resubmit the finalized version of this document. You may proceed with your investigation and feel free to contact me with any additional concerns or questions that may arise. I can be reached at (419) 373-3147.

Sincerely,

Ronald E. Nabors

Ronald E. Nabors
Site Coordinator
Division of Emergency and Remedial Response
Northwest District Office

CC: Archie Lunsey, DERR NWDO
File Copy