

PBOW -AK
TNT B

20 January 2005

MEMORANDUM FOR CELRN-EC-R-M (Ingram)

SUBJECT: Comments from the Review of the Draft Decision Document for TNT Area B, Former Plum Brook Ordnance Works, Sandusky, Ohio, Dated October 2004, Prepared by Shaw Environmental, Inc.

Doug Mullendore's Comments:

1. This review was completed using "*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*", EPA 540-R-98-031, July 1999.
2. Page 2-1, Change Title of Section 2.0 from *General Background Information* to *Decision Summary*.
3. Page 2-2, General Comment. Should information regarding the removal action that was started in this area be discussed in Section 2.0 of the ROD? Further, since the Action Memorandum signed in 2003 describes the basis for the soil remediation and this ROD states the removal action is the appropriate final remedy for soil (Reference Page 1-1) why is it necessary to restate in this ROD, the basis of the removal action and the alternatives evaluated?
4. Page 1-1, 2nd Paragraph. Suggest expanding on the discussion of DERP-FUDS in this section. I recommend this because in Section 2.3 of the ROD, DERP-FUDS is prominently mentioned as a driver for our regulatory authority, but the background for our regulatory authority is never explained.

Suggest adding the following text:

The Formerly Used Defense Sites (FUDS) program was established under DERP to cleanup properties that were under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination or safety hazards caused by DOD. The Army is the executive agent for the FUDS program, and USACE executes the program. The cleanup mission for the FUDS program is to perform appropriate, cost-effective cleanup of contamination caused by DOD and to protect human health, public safety, and the environment. (Army Environmental Center, Army Environmental Cleanup Strategy, April 2003)

5. Page 2-3, Section 2.3, Last Paragraph. Suggest detailing how the DESMOA was intended to involve OEPA at PBOW.

6. Page 2-3, Section 2.4, 1st Paragraph. Recommend discussing that a Community Relations Plan has been developed for the site and then identifying the significant components of that plan and how they were implemented at the site.
7. Page 2-3, Section 2.4. Suggest adding a discussion of the TAPP Grant that the RAB received.
8. Page 2-3, Section 2.4. I would encourage the results of any discussion with the public regarding their views on assumptions about future land use and potential beneficial use of groundwater in this section.
9. General Comment. Suggest including a new section entitled Scope and Role of Response Action after Section 2.0 – Decision Summary and the section titled Field Investigation Activities and Analytical Results. This new section should address the following points:
- How the response action addressed by the ROD fits into the overall site strategy.
 - The planned sequence of actions in bulleted form – (e.g. why the focus on the western portion of the site)
 - The scope of problems those actions will address
 - The authority under which each action will be/has been implemented (e.g., removal or remedial). Also mention how NASA is involved in their own remedial efforts – which are not part of the USACE Scope of Responsibilities.
9. Page 2-4, 1st Paragraph. Suggest adding the discussion regarding the Proposed Plan that was developed for this site.
10. Page 3-1, Section 3.0. Please change the title of this section from “*Field Investigation Activities and Analytical Results*” to “*Site Characteristics*”.
11. Section 3.0. This section needs to be revised to focus on what information is the basis for the action. I would suggest starting the section off with a discussion of the site conceptual model.
- Recommend this discussion include figures, as appropriate, similar to that presented in the guidance document (Highlight 6-10). I believe Figure 4-2 of the ROD is similar.
 - Recommend adding a reference stating that Section 2.2 contains information regarding the size of the site and surface and subsurface features.
 - Recommend adding a discussion of the geographical and topographical features into section 2.2 and including in this section by reference.
 - In lieu of repeating analytical results, recommend discussing the sampling strategy (e.g. which media were investigated and why a particular sampling approach was used).

- A very key point is to discuss known or suspected sources of contamination (e.g. dewatering tanks, flumes, etc.) that are pertinent to the discussion of areas and volumes of contamination.
- Describe types of contamination and the affected media. Include the following information:
 - Types and characteristics of CoCs
 - Quantity of volume of material
 - Concentrations of CoCs in each medium
 - RCRA hazardous wastes and affected media
- Include the discussion on the location of contamination already present in Section 3. In addition to this discussion identify current and potential future surface and subsurface routes of human or environmental exposure.
- Likelihood of migration of CoCs.
- Populations that could be affected.
- Aquifers affected or threatened by site contamination, types of geologic materials, approximate depths, whether aquifer is confined or unconfined.
- Groundwater flow directions within each aquifer and between aquifers and groundwater discharge locations
- Interconnection between surface contamination and groundwater contamination
- How groundwater models were used to define the fate and transport of CoCs, identify the model used and major model assumptions.

12. Add a section that details the entitled *Current and Potential Future Land and Resource Uses* in this section discuss the following:

- Current on-site land uses.
- Current adjacent/surrounding land uses.
- Reasonably anticipated future land uses, with expected time frames for such uses and basis for future use assumptions.
- Ground and Surface Water Uses
 - Current ground/surface water uses on the site and in its vicinity
 - Potential beneficial ground/surface water uses and their basis. If the beneficial use is a potential drinking water source, identify the timeframe of projected future drinking water use.
 - Location of anticipated use in relation to location and anticipated migration of contamination.

13. Section 4.0 Summary of Site Risks. Suggest adding to the introduction the purpose of this section. which are:

- State the basis for taking action at the site.
- Provide a brief summary of the relevant portions of the human health risk assessment for the site.
- Provide a brief summary of the ecological risk assessment.

14. Section 4.0 and following subsections. I believe this section should be focused on those actions which form the basis of the action being taken. The current structure seems to be a summary of the BRA, which shifts the focus away from why the action is being taken. I suggest revising (shortening) as necessary so it is clear what compounds are driving the action.
15. Section 4.0. Suggest adding a clear statement of basis at the conclusion of section 4.0. I believe the guidance gives boiler plate language for this (page 6-13).
16. Section 5.1. Suggest adding
 - How the RAOs address the risks addressed in the previous section.
 - Basis and rationale for RAOs (e.g., current and reasonably anticipated future land use and potential beneficial groundwater use).
17. Section 5.1.1.2. Please move this section to Section 3.0 of the ROD.
18. General Comment. The development of this section should move from a general discussion of the components of the remedies to discussion of common elements, distinguishing features of each alternative, and driving ARARs, including what the expected outcome of each alternative relative to the basis and rationale used in developing the RAO.
19. Page 5-6, Section 5.3. Suggest including a comparative table similar to Highlight 6-25 that discusses the salient points presented in the narrative. I would like to see the underlying reasons for selecting the proposed alternative succinctly identified in this table.
20. Page 5-8, Cost. I would like to see some cost buildup tables similar to that found in Highlight 6-29 and 6.30 included in this document. Currently, only a final dollar figure is presented in the document.
21. Page 6-1, Determination. Change the title to Statutory Determinations.
22. Page 6-2, Protection of Human Health and The Environment. Add that remedy will not pose unacceptable short-term risks and also will reduce ecological risks.
23. Page 6-2. Add a section titled Five-Year Review and state whether a five year review is needed and the rationale behind this decision.
24. Unnumbered Page, Declaration. Please include a ROD Certification Checklist similar to Highlight 6-5 in this document.

Lannae Long's Comments:

1. Section 1: List all the supporting investigation, feasibility and remediation documents that apply to TNTB. In the future, when reviews are looking at this decision document, akin to a record of decision, they will know where to look in the administrative record.
2. Section 1: There should be remedial action goal statement. The remedial goal for NASA is to be able to release the land for unrestricted use. All the work, investigation, feasibility and remediation is to fulfill this goal.
3. Section 4 General: Some sections should be re-written in a future time frame, with the groundwater sections highlighted as to where to add the groundwater information. For example, Section 4.1 1st paragraph can be re-written to read as, "The first phase of human health risk assessment associated with TNTB soils, surface water, and sediment was completed in 2000 (IT, 2000b). The second phase of human health risk assessment associated with contact with TNTB groundwater was completed on XXXXX, (Shaw, XXXX)."
4. Section 4 General: This section could be condensed. For example, Section 4.1.1 could be streamlined or eliminated. It seems unnecessary to have so much text about the protocol of screening the chemicals for COPCs. The big picture for this section is that a full suite of chemical data was evaluated for certain scenarios, and the resulting COCs were defined, and details for the risk assessment can be found in IT, 2000, and SHAW XXXX.

20 January 2005

Plum Brook - AR
TNT B
Lick to
Respond
to Tom

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Doug Mullendore's Comments:

1. This review was completed using "A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents", EPA 540-R-98-031, July 1999.

Response: This guidance, along with the general format developed for decision documents approved for West Virginia Ordnance Works, was used in the original in the preparation of the original draft of the TNT B Decision Document. The guidance will be followed more rigorously to address USACE concerns (see response to Comment No. 2).

2. Page 2-1, Change Title of Section 2.0 from *General Background Information* to *Decision Summary*.

Response: In the ROD guidance, the Decision Summary is essentially the summary of the site, including site history, description, community participation, site characteristics, investigation, risk assessment, feasibility study, and statutory determinations. It is suggested that the ROD guidance be followed with respect to calling this overall summary the "Decision Summary."

If this suggested is declined, then the title will be changed as requested.

Doug Mullendore offered the following: Tom – If what you are saying is the format for the DD will be changed to match the guidance document – I agree with this. I don't have the guidance document in front of me at the moment – but if the Responsiveness Summary is where the public involvement is discussed I say we need to include this section and discuss public involvement efforts. Also notice in the guidance the discussion of surrounding land use – we need to document – how the RAB has been involved with the project and helped determine land use.

Frank, Shaw does not have information on how the RAB has been involved to determine land use. Can Huntington provide such info?

3. Page 2-2, General Comment. **Should information regarding the removal action that was started in this area be discussed in Section 2.0 of the ROD?** Further, since the Action Memorandum signed in 2003 describes the basis for the soil remediation and this ROD

states the removal action is the appropriate final remedy for soil (Reference Page 1-1) why is it necessary to restate in this ROD, the basis of the removal action and the alternatives evaluated?

Response: A new Section titled “Interim Removal Action” will be added as Section 2.5. This section will include the last paragraph of Section 2.4 of the previous draft, revised accordingly. It will also identify the remedial action objectives and state that the interim removal action will meet these. **Frank, is there info as to the status of the removal action--when it began, etc?**

It may be necessary to include the other alternatives to document the basis for decision that has been made regarding the interim action. The TNTB Action Memorandum briefly describes and summarily compares the alternatives, which is appropriate for an interim action. However, the action memorandum does not use the nine NCP criteria as prescribed by 6.3.10 of the ROD guidance for a final ROD. The inclusion of the basis for the removal action and the alternatives evaluated helps the final Decision Document to serve the following three basic ROD functions (Section 1.2.6 of the ROD guidance; a similar list showing four functions is found in 6.1.1)):

- Certify that the remedy selection process was carried out in accordance with CERCLA and, to the extent practicable, the NCP.
- Describe the technical parameters of the remedy, specifying the methods selected to protect human health and the environment including treatment, engineering, and institutional control components, as well as cleanup levels.
- Provide the public with a consolidated summary of information about the site and the chosen remedy, including the rationale behind the selection.

Shaw is certainly willing to delete this information, but we recommend that it be retained in the Decision Document.

4. Page 1-1, 2nd Paragraph. Suggest expanding on the discussion of DERP-FUDS in this section. I recommend this because in Section 2.3 of the ROD, DERP-FUDS is prominently mentioned as a driver for our regulatory authority, but the background for our regulatory authority is never explained.

Suggest adding the following text:

The Formerly Used Defense Sites (FUDS) program was established under DERP to cleanup properties that were under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination or safety hazards caused by DOD. The Army is the executive agent for the FUDS program, and USACE executes the program. The cleanup mission for the FUDS program is to perform appropriate, cost-effective cleanup of contamination caused by DOD and to protect human health, public safety, and the environment. (Army Environmental Center, Army Environmental Cleanup Strategy, April 2003)

Response: Suggested text will be added.

5. Page 2-3, Section 2.3, Last Paragraph. Suggest detailing how the DESMOA was intended to involve OEPA at PBOW.

Response: Frank, I can copy about 3 generic sentences from the September 1995 Site Management Plan about the DSMOA program, but they do not mention PBOW or OEPA. These would not mention “how the DSMOA was intended to include OEPA at PBOW” as Doug requested. Can the LRH provide any information on this?

6. Page 2-3, Section 2.4, 1st Paragraph. Recommend discussing that a Community Relations Plan has been developed for the site and then identifying the significant components of that plan and how they were implemented at the site.

Response: Information from the Community Relations Plan will be added.

7. Page 2-3, Section 2.4. Suggest adding a discussion of the TAPP Grant that the RAB received.

Response: Frank, can LRH provide this info to us?

8. Page 2-3, Section 2.4. I would encourage the results of any discussion with the public regarding their views on assumptions about future land use and potential beneficial use of groundwater in this section.

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 - The scope of problems those actions will address
 - The authority under which each action will be/has been implemented (e.g., removal or remedial). Also mention how NASA is involved in their own remedial efforts – which are not part of the USACE Scope of Responsibilities.

Response: A “Role and Scope of the Operable Unit” will be added. However, we need clarifications:

- What is meant by “the focus on western portion of the site.” If this refers to planned property transactions, Shaw has no information.

Doug Mullendore responded: I believe the first issue is that we are addressing the western portion of the site because NASA believes it can be excessed. The future land use for the area, if it were, would probably residential.

Frank, does LRH have any info on this?

- DOD actions taken/planned to date at AOCs involve TNTA, TNTB, TNTC, and PRRWP. The scope would address direct contact to soil/sediment in these respective areas. We cannot discuss groundwater actions at this time—these may lend themselves more to an “overall strategy” discussion. Please clarify whether the Corps has a different opinion.

I agree with what you have said and suggest that we just have a placeholder for any future groundwater discussions.

- Shaw has no information on NASA remedial actions other than the groundwater treatment systems O&M work plan for the Reactor Area and Garage Maintenance Area. We have no information on the reactor demolition program. It is our understanding that NASA is treating NASA-derived contamination. Yet the Corps’ stated purpose is to investigate/evaluate/remediate only DOD contamination. How does NASA remediation fit into the overall site strategy? Is NASA unable to attain beneficial use criteria that would attain drinking water standards? If so, could this affect any remediation strategy with respect to groundwater? Also, please suggest sources of NASA remediation information that the Corps desires to be included in the TNTB Decision Document.

Doug Mullendore responded: Those are good points and really point to the issues I wanted presented in the DD – that is the actions we are taking under the DERP-FUDs mandate should be identified and separated from those being addressed by other programs. The best approach might be to identify areas we, DOD, are responsible for investigating under DERP-FUDs and then state that other areas of PBS are being investigated by NASA. If you need specific sources I would suggest talking to Frank Albert or Rick Meadows at LRH. Also placing any groundwater, and to a lesser extent soil remedial, actions taken by either USACE or NASA in a sitewide context would be a future addition to the DD so I would suggest including a subsection for this in the DD.

Frank, can LRH provide any info on the green highlighted areas above?