

RE: U.S. NASA PLUM BROOK  
ERIE COUNTY  
OHIO I.D#: 322-0552  
TNT AREAS A & C  
SITE INVESTIGATION WORK PLANS

June 5, 2000

Ms. Linda S. Ingram  
Department of the Army  
Nashville District, Corps of Engineers  
P.O. Box 1070  
Nashville, Tennessee 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 (SSAP) and the Site-Specific Safety and Health Plan (SSHP) for the Remedial Investigations and Feasibility Studies - TNT Area A and TNT Area C" for the former Plum Brook Ordnance Works, Sandusky, Ohio. This document was submitted to the Ohio EPA by the International Technology Corporation (ITC) on behalf of the Corps of Engineers, May 10, 2000 for review and comments. Ohio EPA, DERR is providing the following comments concerning the Site-Specific Work Plans.

Site-Specific Sampling and Analysis Plan

1. Section 2.0 Scope of Work and Objectives, General Comment: Please include a section in Part 2 of this work plan entitled "QAPP Review." Include a statement indicating that the QAPP (IT 1996) has been reviewed for accuracy and is still current. If this statement is incorrect, please indicate the necessary changes to the QAPP in this section and submit the appropriate changes to the QAPP.
2. Section 2.3.5, Page 2-3: This section references a hazard index of "0.1." Please revise this to a hazard index of 1.0.
3. Section 2.3.5, Page 2-3: Ohio EPA is unclear as to how ground water contamination will be confirmed during the remedial investigation at the TNT areas. For clarification, Ohio EPA recommends that IT Corp. add, in the SSAP, what standards will be used to compare to ground water analytical results; Region III ground water RBCs, Ohio drinking water standards, or other.
4. Section 3.2.1.2, Page 3-3: Please indicate if process lines and waste water lines that ran

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- between buildings were above ground or below ground. If the lines were below grade, investigation activities should determine if these lines are still present or were removed during decontamination activities. If lines are present, samples should be collected.
5. Section 3.2.1.3, Page 3-3: For clarification, IT Corp. should include specific text in the 4th sentence, stating that shallow ground water samples will be collected for total analyses (unfiltered). Inorganic (metals) analytical data should be evaluated as such.
  6. Sections 3.2.1.3 and 3.2.2.3, Pages 3-3 and 3-5: For clarification, IT Corp. should include specific text, in that ground water samples will be analyzed by a fixed laboratory for confirmation of contamination and not for screening purposes. If shallow ground water samples are to be collected for both types of analyses, then this should be clearly stated in the text.
  7. Sections 3.2.2.1 and/or 3.3.2.1, Pages 3-4 and 3-7: For clarification, IT Corp. should include specific text, in that subsurface soil samples will be collected using Geoprobe or similar direct-push methodologies. Section 3.3.2.1 of the text mentions acetate liners and sampling cores but not the method of installation.
  8. Section 3.2.2.2, Page 3-4: See comment number 4.
  9. Section 3.3.3, Page 3-8: IT Corp. states in the SSAP that temporary piezometers may be required to be installed in soil sampling boreholes for the purpose of ground water sampling if low yield conditions are encountered. IT Corp. should provide a brief discussion in this section as to the installation, construction, and materials associated with the temporary piezometers.
  10. Section 3.3.3, Page 3-8: IT Corp. states in the SSAP that static water levels will be measured and recorded from both hydropunch and temporary piezometers prior to sampling. If IT Corp. intends to generate potentiometric surface maps of the shallow saturated zone based on these measurements, then any water level measurements collected contemporaneously from existing monitoring wells should not be incorporated into the maps. It is inappropriate to combine the two data sets due to their differences in construction, installation, development, and sampling protocols. IT Corp. can compare the two data sets but separate potentiometric surface maps should be generated for each.
  11. Section 3.4, Page 3-10: Please revise this section to state that if groundwater is encountered the boring will be backfilled with bentonite above the water bearing zone.

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12. Section 4.2, Page 4-1: Recent correspondence from U.S. EPA indicates that Ordnance/Ammunition manufacturing has resulted in a contamination concern for perchlorate. The Ohio EPA Office of Federal Facilities Oversight (OFFO) has directed that this parameter be considered as a contaminant of concern (COC) for all former Ordnance facilities. Please review historical information and determine if perchlorate should be added to the Analytical Program.
13. Section 4.2, Page 4-2: IT Corp. has not provided a discussion of the analyses of shallow ground water in the SSAP. Ohio EPA recommends that IT Corp. provide a statement of the analyses to be performed on shallow ground water or reference applicable portions of the SSAP (e.g., Sections 3.2.1.3 or 3.2.2.3) in this section for consistency/clarification.

Site-Specific Health and Safety Plan

1. Tables 4-1 and 4-2 of this SSHP refer to "Plumb" Brook Ordnance Works. Please correct to "Plum" Brook Ordnance Works.

Please review these comments and incorporate them in the revised version of this document. Should you desire a meeting, or have questions and/or concerns regarding these comments feel free to contact me at (419) 373-3147.

Sincerely,

Ron Nabors  
Site Coordinator  
Division of Emergency and Remedial Response  
Northwest District Office

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pc: NWDO DERR file