

April 2, 2009

Mr. Rick Meadows
Ms. Lisa Humphreys
US Army Corps of Engineers
Huntington District
502 8th Street
Huntington, WV 25701-2070

Mark F. Bohne, Co-Chairman
Plum Brook Ordnance Works
Restoration Advisory Board
311 East Mason Road
Milan, Ohio 44846

Re: Comments Regarding The TNT C Proposed Plan

Please see my comments below on the TNT C Proposed Plan for the Plum Brook Ordnance Works presented to the public on March 12, 2009.

Windrow composting of contaminated soils will render soils contaminated with ADNT after completion of the process. This will require disposal of non-lead contaminated soils in the Erie County Landfill.

- (1) What specific environmental / human hazards are associated with ADNT that preclude on-site use of the soils and require disposal at the Erie County Landfill?
- (2) Would it be more cost effective to treat non-lead contaminated soils after windrow composting with the proposed Alkaline Hydrolysis process to eliminate the ADNT and therefore eliminating the need for offsite disposal?

Erie County Landfill has been issued a permit from the Ohio EPA to use ADNT-contaminated soils as temporary cover at the landfill. I understand that the Army Corps of Engineers is not responsible for the proper disposal of soils contaminated with ADNT at the Erie County Landfill. As there may be environmental issues related to Erie County's disposal of contaminated soils, please address the following:

- (1) What are the potential hazards when airborne particles migrating off of the disposal site from the temporary cover is carried to neighboring properties?
- (2) In February 2008, a Title V Air Permit Public Hearing was held for the Erie County Landfill. Evidence was provided showing that soils were being carried by vehicle traffic offsite. The soils were carried north and south from the landfill site on Hoover Road. What are the potential hazards related to ADNT-contaminated soils being carried off site and spread down the public right-of-way?

200.1e

G050H001815_08.12.0501_a

(3) Soils being carried by vehicle traffic from the Erie County Landfill are also left at the entrance area to the landfill. Mud Brook, a tributary to the Huron River and consequently to Lake Erie, passes along the south of the entrance area. What are the potential hazards related to ADNT soils being washed into Mud Brook from the landfill entrance area?

Please assure that these comments and your reply is included in the public record.

Thank you for your attention to this matter.

Sincerely,

Mark F. Bohne, Co-Chairman
Plum Brook Ordnance Works Restoration Advisory Board