



State of Ohio Environmental Protection Agency

Northwest District Office

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Bob Taft
Governor

RE: U.S. NASA PLUM BROOK
ERIE COUNTY
OHIO I.D.#: 322-0552
REVIEW OF RESPONSE TO OHIO EPA
TECHNICAL REVIEW COMMENTS

September 1, 2000

U.S. Army Corps of Engineers
Ms. Lannae Long
CELRN-ED-R-D
P.O. Box 1070
Nashville, TN 37202

Dear Ms. Long;

The Ohio Environmental Protection Agency (EPA), Division of Emergency and Remedial Response (DERR), has reviewed the U.S. Army Corps of Engineers Response to Ohio EPA Technical Review Comments, for the Risk Assessment and Direct Push Investigation of the Red Water Ponds Areas, Former Plum Brook Ordnance Works, Sandusky, Ohio. The Ohio EPA, DERR is writing this memo as a follow-up to the May 10, 2000 comment resolution meeting held at the NASA Plum Brook Station in Sandusky, Ohio. At the aforementioned meeting the Ohio EPA received the following comment response letters:

- 1) Response to Ohio EPA Technical Review Comments, Risk Assessments and Direct Push Investigation of the Red Water Ponds Areas, Former Plum Brook Ordnance Works, Sandusky, Ohio, dated May 4, 2000.
- 2) Response to Ohio EPA Technical Review Comments on The TNT Area B Remedial investigation at the Former Plum Brook Ordnance Works in Sandusky, Ohio, dated May 8, 2000.

The Ohio EPA, DERR would like to thank the U.S. Army Corps of Engineers (USACE) for the opportunity to discuss and resolve comments during this meeting. We would like to take this time to summarize the resolution of key issues regarding the risk assessment.

- In response to Comment #27c and Comment #31 of the Red Water Ponds comment response letter and Comment #12 of the TNT Area B comment response letter, it was decided that the calculated UTL value can be used as the background concentration for the Red Water Ponds Investigation Report and the TNT Area B Remedial Investigation Report only. Ohio EPA reviewed the data and compared the maximum detected values of each constituent with the calculated 95% UTL value. It was determined that even though the UTL value may exceed the maximum detected value for a constituent, using either the 95% UTL or the maximum detected value for the background concentration did not change the outcome of this assessment. However, in the future, Ohio EPA recommends that the maximum detected value will be used as the background concentration when the calculated 95% UTL exceeds the maximum detected concentration for a constituent. This is the most conservative approach and should be followed in future assessments



- In response to Comment #4 of the Red Water Ponds comment response letter and Comment #10 of the TNT Area B comment response letter, PAHs will be retained in the risk assessment and all text regarding the presence of anthropogenic PAHs will be discussed in the uncertainty section of the report. Ohio EPA recommends using site-specific background data to build a defensible case regarding the concentrations of anthropogenic PAHs detected at the former Plum Brook Ordnance Works. Ohio EPA acknowledges that there are no plans to collect site-specific data for PAHs.
- In response to Comment #2 of the Red Water Ponds comment response letter and Comment #9 of the TNT Area B comment response letter, it is agreed that exposure to groundwater will be addressed separately in a site-wide groundwater investigation. Ohio EPA advises that additional text be included in the current reports to explain that exposure to groundwater will be addressed in a separate report at a future date. The exposure assumptions for receptors exposed to groundwater (i.e., the construction worker) can be discussed prior to characterizing site-wide groundwater and conducting a risk assessment.
- It is the understanding of Ohio EPA that USACE is going to address comment #10 of the Red Water Ponds comment response letter (and any comments corresponding to this topic in the TNT Area B comment response letter) in light of discussions during the May 10, 2000 meeting. Specifically, USACE is going to provide Ohio EPA with information and documentation supporting the statement that large volumes of ambient air are assumed to dilute airborne concentrations of VOCs to toxicologically insignificant levels.
- In response to Comment #21 of the TNT Area B comment response letter, Exposure assumptions should be consistent with the assumptions selected for the construction worker receptor as outlined in Section 3.1.3.2 of the report. In this section, construction projects are assumed to last 6 months. It should be assumed that the arms (not just the forearms) and hands contact surface water and sediment, resulting in approximately 3,100 cm² (EPA 1992).

All remaining issues/comments have been addressed in the written response letters to Ohio EPA and are acceptable. Should you desire a meeting or have questions and/or comments regarding this correspondence, feel free to contact me at (419) 373-3147 or Laurie Moore at (937) 285-6457.

Sincerely,



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

/sw

cc: Richard L. Meadows, USACE
Laurie Moore, OFFO, SWDO
DERR File