CELRH-PM-PP-P

7 January 2014
JACKSON/5380

MEMORANDUM FOR RECORD

SUBJECT: Public Comment Period for Proposed Plan, Plum Brook Ordnance Works Redwater Ponds, Project G05OH001820

1. The Public Comment Period for the Former Plum Brook Ordnance Works Redwater Ponds Project G05OH001820 was from 20 November 2014 through 22 December 2014.

2. On 20 November 2014 a public meeting was held at Firelands Community College in Huron, Ohio concerning the subject Proposed Plan.

3. During the public comment period, Ms. Sharon Barnes presented the undersigned with the enclosed comments via e-mail. Ms. Barnes' comments refer to the subject Proposed Plan.

4. Ms. Barnes was the only individual who responded during the Public Comment Period. No other comments were received regarding the Proposed Plan.

Richard L Meadows

Encl
as

RICHARD L. MEADOWS
Project Manager
Formerly Used Defense Sites

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Comments on the Proposed Plan for the Red Water Pond Areas

FUDS Project No. G05OH001820

Based on a review of the Proposed Work Plan for the Red Water Pond (RWP) areas, but more specifically the PRRWP Area, I submit the following comments:

1. Alternatives 3 and 4 are the most desirable as they provide for the *treatment of the native soil*. In this proposal it is assumed that Alternative 4 is the only alternative that provides for reuse on site of any treated soils. In this Proposed Plan, it indicates that in the execution of Alternative 3—Excavation, Windrow Composting and Off-Site Disposal, all of the soil would go to off-site disposal. That was not the case when composting technology was used on similarly contaminated soils in the past. Why is that the conclusion for composting technology in this round?

2. Using Alternative 3, composting technology, the resulting remediated native soils would have a pH more in line with normal background levels and increased organic matter content. In the long term effectiveness, would a composted soil with a pH falling into the native background levels and having a higher organic matter content be more acceptable?

3. According to the US EPA, "The ultimate goal in any remediation project is to return the site to its pre-contamination condition, which often includes re-vegetation to stabilize treated soils." Has it been considered in the overall long term effectiveness of the project that the performance of soils treated with Alternative 3 (composting technology) could show an overall increase in plant performance and improve surface water quality? Because the composted soils would result in a higher organic matter content the remediated soils would provide additional capability to preserve water quality by increasing water retention in the soils, manage nutrients, cleanse runoff and storm water by binding pollutants and filtering particulates. Soils with higher organic matter have shown to suppress plant pathogens.

4. Since the implementation of the first rounds using composting technology to bio-remediate the TNT contaminated soils, there may be new best available technologies that could improve efficiencies in the process. Is the cost estimate presented for Alternative 3 commensurate with the past work on a per unit basis—from excavation through reuse on site/disposal? Has a recent estimate for Alternative 3 been considered?

Comments presented by:

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