



State of Ohio Environmental Protection Agency

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November 14, 2006

Mr. Richard Meadows
U.S. Army Corps of Engineers
Huntington District
502 Eighth Street
Huntington, WV 25701-2070

Re: Interim Final Site Characterization Report, Remedial Investigation, Part 1, at Acid Areas 2 and 3, document dated September 2006; Jacobs Engineering Group, Inc. Received by Ohio EPA (NWDO) on September 19, 2006

Dear Mr. Meadows:

Ohio EPA has reviewed the above document and is providing the following comments for your use.

1. Ohio EPA observed that overburden monitoring well MK-MW10 was not included on Figure 3-1 (Acid Area 2 sampling location map) of the September 2006, Interim Final Site Characterization Report, Remedial Investigation, Part 1, at Acid Areas 2 and 3 (report).
2. Section 7.2 of the U.S. Army Corps of Engineers (USACE) and Jacobs Engineering Group, Inc. (Jacobs) September 2006, report states that soils at Acid Areas 2 and 3 are not impacting ground water (overburden or carbonate bedrock ground water). USACE/Jacobs base this conclusion on the fact that bis(2-ethylhexyl)phthalate which was detected in shallow ground water, is a common laboratory contaminant and several SVOCs detected in the carbonate bedrock zone (Delaware Limestone) are due to naturally occurring petroleum.

Ohio EPA concurs with USACE/Jacobs that bis(2-ethylhexyl)phthalate is a common laboratory contaminant and that naturally occurring petroleum does exist within the Delaware Limestone beneath NPBS and Erie County as a whole. However, Ohio EPA does not necessarily agree that soils at Acid Areas 2 and 3 have not contributed constituents of concern to overburden and carbonate bedrock ground water. In addition to benzene, toluene, ethylbenzene, and xylene, a number of additional organic compounds were also detected (including methyl ethyl ketone, phenol, 2-methylphenol, 1,3-dinitrobenzene, and 2-nitrotoluene) in both saturated zones which does not support the theory of a single contaminant source (naturally occurring petroleum). Refer to Tables 5-3 through 5-9 of the report for additional information.

Ohio EPA anticipates that further characterization of the overburden and carbonate saturated zones beneath Acid Areas 2 and 3 will be completed via a human health risk assessment and/or the site-wide ground water investigation.

3. Section 7.5 of the report recommends that bedrock monitoring well AA3-BEDGW-004 be properly abandoned as it displays low to no recharge. Ohio EPA recommends that if USACE/Jacobs intend to abandon the well that they wait until additional sampling points require abandonment or until additional field investigations are implemented at NPBS to reduce mobilization costs. Well abandonment activities should be properly performed and documented via Ohio Department of Natural Resources Division of Water well sealing reports. Copies of the aforementioned sealing reports should be included in a corresponding report documenting abandonment activities for submittal to Ohio EPA. USACE/Jacobs should consult the following references for assistance in completing well abandonment activities:

- a. Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring (Ohio EPA, February 1995);

<http://www.epa.state.oh.us/ddagw/Documents/ChapterGuid09abd0205.pdf>

- b. Chapter 9 of the Ohio EPA February 2005, Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring. The procedures can be found in detail at the following internet address:

<http://www.epa.state.oh.us/ddagw/Documents/ChapterGuid09abd0205.pdf>

- c. State of Ohio Technical Guidance for Sealing Unused Wells; State Coordinating Committee on Ground Water (1996);

<http://www.dnr.ohio.gov/water/pubs/pdfs/wellsealing.pdf>

- d. Ohio Department of Natural Resources Division of Water Fact Sheet (92-6), Properly Sealing Unused Wells (12/16/92);

http://www.dnr.ohio.gov/water/pubs/fs_div/fctsht06.htm

Sincerely,



Paul M. Jayko
Division of Emergency & Remedial Response

/llr

pc: DERR-NWDO File
ec: Lisa Humphreys, USACE