



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, Ohio 43402
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Bob Taft
Governor

RE: PLUM BROOK ORDNANCE WORKS
ERIE COUNTY
OHIO I.D#: 322-0552
GARAGE MAINTENANCE AREA

October 8, 1999

Department of the Army
U.S. Army Engineer District, Louisville
Corps of Engineers
Mr. Douglas Meadors
P.O. Box 59
Louisville, KY 40201-0059

Dear Mr. Meadors:

The Ohio Environmental Protection Agency (EPA), Division of Emergency and Remedial Response (DERR), has reviewed the draft "Limited Site Investigation, Quality Assurance Project Plan (QAPP)" and draft "Final Report" for the Garage Maintenance Area (GMA) at the former Plum Brook Ordnance Works, Sandusky, Ohio. These documents were submitted to the Ohio EPA by the Corps of Engineers, on July 29, 1999 and September 9, 1999 for review and comments. The Ohio EPA, DERR is providing the following comments.

Limited Site Investigation, Quality Assurance Project Plan

1. General Comment: The Ohio EPA, DERR, would prefer to receive the Quality Assurance Project Plan under separate cover and have it referenced in all site investigation Work Plan submittals.
2. Section 1.1 Introduction, page 1: Please indicate if the Health and Safety Plan reference in the third sentence should read Data Quality Objectives dated May 1999.
3. Section 1.2 Site Description, page 2: This document is referred to as the Garage Maintenance Area. However, the first paragraph on the page states that only the Locomotive Shop and Car Washing Pit will be investigated. This document and subsequent text should reference the Locomotive Shop and Railroad Car Washing Pit. This is recommended because there are other buildings in the GMA that are not being investigated and the title of the document should reflect the area that is being studied.
4. Section 1.2 Site Description, page 2: Please rename the "Car Washing Pit" as the "Rail Car Washing Pit."
5. General Comment: The flow of the document is very confusing as it jumps back and forth between the entire Plum Brook Ordnance Works (PBOW) history and the history of the Garage Maintenance Area (GMA). Please create a Plum Brook Ordnance Works general history section and focus the remainder of the document on the GMA site investigation.
6. Section 1.2.1 Facility Size and Borders, page 2: Please indicate the size and the Borders of the GMA.
7. Section 1.3 Past Data Collection Activities, page 2: This section should focus on the Locomotive Shop and the Rail Car Washing Pit. Historical information should only be included if it can be applied to the site specific investigation.



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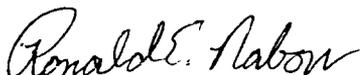
8. Field Sampling Plan, Section 1.2.2 Site Specific, page 3: Figure 1, as referenced in the text is mislabeled.

Final Report

1. General Comment: This document is referred to as the Garage Maintenance Area. However, only the Locomotive Shop and Car Washing Pit were investigated. This document and subsequent text should reference the Locomotive Shop and Railroad Car Washing Pit. This is recommended because there are other buildings in the GMA that were not investigated and the title of the document should reflect the area that was studied.
2. General Comment: Since the Locomotive Shop and the Rail Car Washing Pit areas have been recommended for further studies/action, Ohio EPA, DERR will not request data gap analysis at this time.

The Ohio EPA, DERR, is not able to approve the Quality Assurance Project Plan or the Final Report for the Garage Maintenance Area at this time. The Army Corps of Engineers must revise or provide the information missing from the QAPP document and the Final Report. If you have any questions or concerns regarding this correspondence please contact me at (419) 373-3147.

Sincerely



Ronald E. Nabors
Site Coordinator
Division of Emergency and Remedial Response
Northwest District Office

/csr

CC: Richard Meadows, USACE, Huntington
Bonnie Buthker, OFFO, SWDO
Archie Lunsey, DERR NWDO
DERR, NWDO File