Richard Meadows, Co-Chairman
Plum Brook Ordnance Works Restoration Advisory Board
US Army Corps of Engineers
Huntington District
502 Eighth Street
Huntington, West Virginia 25701-2070

Mark F. Bohne
311 East Mason Road
P.O. Box 447
Milan, Ohio 44846

Re: Groundwater Proposed Plan – Plum Brook Ordnance Works

The importance of the overall environmental condition of ground water cannot be minimized. Over the course of the massive project to remediate the TNT / DNT sites at Plum Brook, it is evident that significant soils contamination has occurred. The Army Corps of Engineers should be recognized for their tenacity to uncover and clean up the site.

Testing of ground water sources, both in the overburden and in the bedrock substrates have posed some significant challenges over the period. During the time, Bennett & Williams (Julie Weatherington-Rice, hired as a contractor to advise the RAB) performed evaluations that also included some offsite investigations (which were not included in the work performed for the RAB). Her perspectives are important for a number of reasons. First must be her familiarity with glacial deposits in the State of Ohio. Second is her full understanding of clay soils and their physical changes as water tables rise and subside. Finally, her expertise in the rock formations which form the underburden at Plum Brook. Her research and commentary are part of the public record and must be considered now and in the future.

While the research provided by the contractors used by the Army Corps of Engineers has been exemplary, the installation of sampling wells has always been a "best guess" for location. It is safe to say that driving a hole in the ground for a sampling well could easily miss a joint, fracture or karst feature in the rock that could be used to transport ground water carrying contaminants either vertically or horizontally from one point to another, even off site.

No one reviewing the research and remediation of the Plum Brook Ordnance Works could argue that an environmental impact took place. While the work has been extensive, there is no guarantee that 100 percent of the problems have been uncovered and cleaned-up.

To close, if I may make the comparison between a cancer patient and the site. Anyone who has been treated for cancer, undergoes years of testing to assure

that remission has occurred. Similarly, the Plum Brook Ordnance Works should be measured post remediation to assure that any remaining contamination has been removed. I can find no better way to make that determination than the continued testing of wells, both in the overburden and the bedrock to check for signs that, (1) past remediation was successful, indicative of a reduction in chemical impact or, (2) future remediation must be initiated if chemical levels show that another point source exists.

If there are any questions or comments, please do not hesitate to contact me directly for clarification.

Sincerely,

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