

E-C-R-D      20 March 01      -B

Benton, James S (RN)

**Synopsis of the Scoping Meeting for the Groundwater RI/FS at  
TNT Areas A, B, & C and the Red Water Ponds Areas at the Former Plum Brook  
Ordnance Works, Sandusky, Ohio**

**19 March 2001**

**Date of Meeting:** 15 March 2001

**Meeting Location:** Ohio EPA SWDO, Dayton, Ohio.

**Attendees:**

Ron Nabors, Ohio EPA	Laurie Eggert, Ohio EPA
John Weaver, Ohio EPA	Bonnie Buthker, Ohio EPA
Linda Ingram, USACE Nashville	Jim Beaujon, USACE Nashville
Doug Mullendore, USACE Nashville	Lannae Long, USACE Nashville
Mikael Spangberg, IT Corporation	Michael Gunderson, IT Corporation

**Synopsis of Meeting:** The meeting was called to order at 9:30 a.m. at the OEPA's Southwest District Office. The following synopsis provides details of the key agreements, understandings and/or actions and the underlying logic for such actions that were discussed in the meeting.

1. The USACE explained that they were trying to obligate money for the groundwater investigation by the end of March 2001. They stated that available funding may not be sufficient to award the entire scope of work, but that the project needed to be planned as thoroughly as possible in order to capture any funds that might be available at the end of the quarter.
2. OEPA suggested that the USACE utilize the NASA groundwater data to the extent possible. It was suggested that USACE contact NASA and request this information; USACE agreed that they would do so.
3. OEPA agreed that the three proposed background wells and the two previously installed background wells provide sufficient coverage of bedrock background groundwater conditions. However, OEPA did suggest that 2 additional wells, in addition to those already identified but not installed, be scoped as a contingency in case the current understanding of the bedrock groundwater regime is incorrect or is refined at a later date. It was agreed that the USACE should include provisions to sample these background wells for eight quarters, but that the data collected from these wells be evaluated after four events to determine if additional sampling events were required. OEPA suggested and USACE agreed to utilize a trend analysis and that such analysis would be limited to a focused number of background constituents. Sampling of the background wells would cease if a "flat" trend were identified.

4. OEPA agreed that previously collected background data should be incorporated with new background data following an evaluation that such data are comparable with newly collected data.
5. USACE and OEPA agreed on the following analyses for background bedrock groundwater samples: PAH, TAL Metals (Filtered and Unfiltered), Nitroaromatics, TCL VOCs.
6. OEPA approved USACE's request that bedrock groundwater no longer be sampled for PCBs in any of the five areas identified in this SOW (TNT A, TNT B, TNT C, PRRWP, WARWP). OEPA requested, and USACE concurred, that the rationale for dropping any analytical methods would be included in the work plans. This rationale will be presented in tabular form on a well-by-well basis and will be based on past analytical results for both soil and groundwater as well as historical site uses.
7. The USACE requested that sampling of bedrock groundwater wells (not associated with background wells) be limited to two sampling events; one event during low groundwater levels and one during high groundwater levels. OEPA agreed with this recommendation.
8. It was agreed that risk assessments for bedrock and overburden groundwater would be conducted on a site-specific basis. Thus, the risk assessment for groundwater under this scope will consist of six areas – TNT Area A, TNT Area B, TNT Area C, Pentolite Road Red Water Ponds, West Area Red Water Ponds, and the Point of Compliance Wells to represent the current off-site resident. Groundwater modeling will be required to evaluate the future off-site resident. Current on-site conditions will be assumed to be current and future (worst case) conditions. Agricultural irrigation is not a complete pathway. The Risk Assessment Workplan will spell out rationale for incompleteness.
9. OEPA reiterated their previous position that the overburden groundwater bearing zone is not a potable residential water supply, due to insufficient yield and the inability to meet health department construction criteria. It was therefore agreed that the need to perform a residential scenario under the risk assessment could be removed.
10. OEPA and USACE agreed to scope for the installation of five new overburden wells each in TNT Areas A, B, and C; a lesser quantity can be evaluated during the work plan reviews with sufficient justification. The new wells will be sampled for analytes determined on a site-specific basis. As with the bedrock wells, the rationale for the selected analytical suite will be detailed in the work plans and will be based on past analytical groundwater and soil results as well as historical site uses.
11. OEPA and USACE agreed to use direct push technology to determine extent of contamination and to help site overburden wells in each of the TNT Areas A, B, and C. It was also agreed that the direct push samples collected would be analyzed for nitroaromatics compounds only using the modified 8330 screening method previously utilized in the TNT Areas A and C soil investigations.

The meeting was adjourned at 2:10 p.m.