

**Final
No Further Action Record of Decision for
RVAAP-050-R-01 Atlas Scrap Yard
Munitions Response Site**

**Former Ravenna Army Ammunition Plant
Portage and Trumbull Counties, Ohio**

**Contract No. W912DR-15-D-0016
Delivery Order No. 0001**

Prepared for:



**US Army Corps
of Engineers®**

**U.S. Army Corps of Engineers
Baltimore District
2 Hopkins Plaza
Baltimore, Maryland 21201**

**Prepared by:
HydroGeoLogic, Inc. (HGL)
11107 Sunset Hills Road
Suite 400
Reston, Virginia 20190**

September 5, 2018

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REPORT DOCUMENTATION PAGE

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14. ABSTRACT The U.S. Department of the Army (U.S. Army) is presenting this No Further Action (NFA) Record of Decision to document the No Further Action determination for the former Ravenna Army Ammunition Plant, RVAAP-050-R-01 Atlas Scrap Yard Munitions Response Site (MRS), in Portage and Trumbull Counties, Ohio. This NFA Record of Decision presents the U.S. Army's No Further Action determination. Investigations have found no munitions and explosives of concern or concentrated areas of munitions debris, and no potential source of munitions constituents exists at the MRS. Therefore, there is no source material or impacted environmental media resulting from historical U.S. munitions-related activities at the MRS.					
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a. REPORT	b. ABSTRACT	c. THIS PAGE			Kimberly Vaughn
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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

October 18, 2018

Mr. David Connolly
Army National Guard Directorate
Environmental Program Division
111 South George Mason Drive
Arlington, VA 22204

**Re: US Army Ravenna Ammunition Plt RVAAP
Remediation Response
Approval
Remedial Response
Portage County
267000859240**

Subject: Concurrence with the "Final No Further Action Record of Decision, RVAAP-050-R-01 Atlas Scrap Yard Munitions Response Site Version 1.0" Munitions Response Services at the Former Ravenna Army Ammunition Plant, Portage and Trumbull Counties, Ohio: Dated September 5, 2018 (Work Activity No. 267000859240)

Dear Mr. Connolly:

The Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO), Division of Environmental Response and Revitalization (DERR) has received and reviewed the "Final No Further Action Record of Decision, RVAAP-050-R-01 Atlas Scrap Yard Munitions Response Site Version 1.0" document dated September 5, 2018. This document was received by Ohio EPA's NEDO on September 6, 2018. It was prepared by HydroGeoLogic, Inc. (HGL).

The Military Munitions Response Program (MMRP) remedial investigation for the Atlas Scrap Yard munitions response site (MRS) investigated the potential presence of munitions and explosives of concern (MEC) within the defined portion of the MRS. To date, no MEC has been found at the MRS; therefore, sampling for munitions constituents was not warranted. The chemicals of concern identified in surface soil during previous investigations will continue to be addressed under the Installation Restoration Program. As there are no further comments, or potential issues to address for the MRS, Ohio EPA concurs with the remedy of no further action for the MRS.

If you have any questions concerning this letter, or any findings made by Ohio EPA, please contact Nicholas Roope at (330) 963-1235.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Butler", is written over the word "Sincerely,".

Craig W. Butler, Director

CB/NCR/nvp

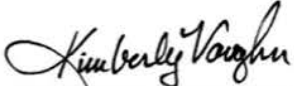
ec: Nat Peters, USACE
Katie Tait/Kevin Sedlak, OHARNG RTLS
Craig Coombs, USACE
Rebecca Shreffler, Chenega
David Connolly, ARNG
Mark Johnson, Ohio EPA, NEDO DERR
Bob Princic, Ohio EPA, NEDO DERR
Tom Schneider, Ohio EPA, SWDO DERR

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CONTRACTOR'S STATEMENT OF INDEPENDENT TECHNICAL REVIEW

HydroGeoLogic, Inc. has completed the *Final No Further Action Record of Decision for RVAAP-050-R-01 Atlas Scrap Yard Munitions Response Site*, at the Ravenna Army Ammunition Plant, Portage and Trumbull Counties, Ohio. Notice is hereby given that an independent technical review has been conducted that is appropriate to the level of risk and complexity inherent in the project. During the independent technical review, compliance with established policy principles and procedures, utilizing justified and valid assumptions, was verified. This included review of data quality objectives, technical assumptions; methods, procedures, and materials to be used; the appropriateness of data used and level of data obtained; and reasonableness of the results, including whether the product meets customer's needs consistent with law and existing United States Army Corps of Engineers policy.

Reviewed/Approved by:	<small>Digitally signed by Janardan J Patel DN: cn=Janardan J Patel, o=HGL, ou=ECD, email=jpatel@hgl.com, c=US Date: 2018.09.04 15:14:38 -0400</small> Janardan J Patel	Date: <u>09-04-2018</u>
	Janardan Patel, PMP Program Manager	
Prepared/Approved by:	 Kimberly Vaughn	Date: <u>9-5-2018</u>
	Kimberly Vaughn Project Manager	

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RVAAP-050-R-01 Atlas Scrap Yard
Munitions Response Site**

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September 5, 2018

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Tom Schneider, Ohio Environmental Protection Agency, Federal Facilities	0	1
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ARNG – Army National Guard

COR – Contracting Officer’s Representative

IED – Installation and Environment Division

OHARNG – Ohio Army National Guard

RVAAP – Former Ravenna Army Ammunition Plant

USACE – United States Army Corps of Engineers

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ACRONYMS AND ABBREVIATIONS

AMC	Army Materiel Command
amsl	above mean sea level
AOC	Area of Concern
Army	U.S. Department of the Army
Camp Ravenna	Camp Ravenna Joint Military Training Center
CB&I	CB&I Federal Services, LLC
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CSM	Conceptual Site Model
DA	U.S. Department of the Army
DERP	Defense Environmental Restoration Program
DFFO	Director's Final Findings and Orders
DMM	discarded military munitions
DoD	Department of Defense
e ² m	Engineering-Environmental Management, Inc.
ERA	Ecological Risk Assessment
GOCO	U.S. Government-Owned and Contractor-Operated
HA	Hazard Assessment
HGL	HydroGeoLogic, Inc.
HHRA	Human Health Risk Assessment
I&E	Installation and Environment
IRP	Installation Restoration Program
JMC	Joint Munitions Command
MC	munitions constituents
MD	munitions debris
MEC	munitions and explosives of concern
mm	millimeter
MMRP	Military Munitions Response Program
MPPEH	material potentially presenting an explosive hazard
MRS	munitions response site
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
ODNR	Ohio Department of Natural Resources
OHARNG	Ohio Army National Guard
Ohio EPA	Ohio Environmental Protection Agency
PP	Proposed Plan
RAB	Restoration Advisory Board
RI	Remedial Investigation

ACRONYMS AND ABBREVIATIONS (continued)

ROD	Record of Decision
RVAAP	Ravenna Army Ammunition Plan
SARA	Superfund Amendments and Reauthorization Act
SI	Site Inspection
TESL	Threatened and Endangered Species List
TNT	2,4,6-trinitrotoluene
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USP&FO	U.S. Property and Fiscal Officer
UXO	unexploded ordnance

PART I: DECLARATION

A. SITE NAME AND LOCATION

The U.S. Department of the Army (DA or Army) developed this No Further Action (NFA) Record of Decision (ROD) at RVAAP-050-R-01 Atlas Scrap Yard Munitions Response Site (MRS). The Atlas Scrap Yard MRS is located at the eastern central portion of Camp Ravenna (**Figures 1 and 2**).

The Ravenna Army Ammunition Plant (RVAAP) is now known as Camp Ravenna Joint Military Training Center (Camp Ravenna). The 21,683 acre federally owned installation is located in Portage and Trumbull Counties, Ohio approximately 3 miles east-northeast of the City of Ravenna (**Figure 1**). Administrative accountability for Camp Ravenna was transferred to the U.S. Property and Fiscal Officer (USP&FO) for Ohio (the property owner) in multiple transfers, the last completed in September 2013. The facility is licensed to the Ohio Army National Guard (OHARNG) for use as a military training facility (Federal Facility ID No. OH213820736).

To maintain a distinction between historical operations and current activities, the term “RVAAP” will be used for historical discussions and “Camp Ravenna” will be used when referring to the current facility activities.

B. STATEMENT OF BASIS AND PURPOSE

The Army is the lead agency for environmental response actions at Camp Ravenna. The Army, in consultation with the Ohio Environmental Protection Agency (Ohio EPA), determined that NFA is the selected remedy for the Atlas Scrap Yard MRS at the Camp Ravenna. The NFA determination meets the requirements of the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) of 1980, as amended by the *Superfund Amendments and Reauthorization Act* (SARA) of 1986 and the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP). The Army’s decision is based on information contained in the Administrative Record file for the Atlas Scrap Yard MRS.

The Atlas Scrap Yard MRS overlaps with the RVAAP-50 area of concern (AOC) being investigated under the Installation Restoration Program (IRP), pursuant to CERCLA requirements. The IRP AOC RVAAP-50 extends slightly east and slightly south of the Atlas Scrap Yard MRS. Soil, sediment, surface water, and groundwater contamination identified within the IRP AOC during a 2006 sampling event will continue to be addressed under the IRP.

The Ohio EPA, the supporting state regulatory agency, reviewed and concurred with the *Final No Further Action Proposed Plan for RVAAP-050-R-01 Atlas Scrap Yard Munitions Response Site* (HGL, 2017). The NFA Proposed Plan (PP) presented the Army’s preferred remedy for addressing the Atlas Scrap Yard MRS and invited public involvement during the comment period (November 3 through December 8, 2017) and public meeting (November 8, 2017). No Department of Defense (DoD) military munitions (i.e., unexploded ordnance [UXO], discarded military munitions [DMM] or munitions constituents [MC]) originating from historical activities associated with the Atlas Scrap Yard MRS have been encountered throughout the CERCLA process. The NFA determination under the CERCLA process at the Atlas Scrap Yard MRS satisfies the requirements of the *Director’s Final Findings and Orders* (DFFO) (Ohio EPA, 2004).

C. DESCRIPTION OF THE SELECTED REMEDY

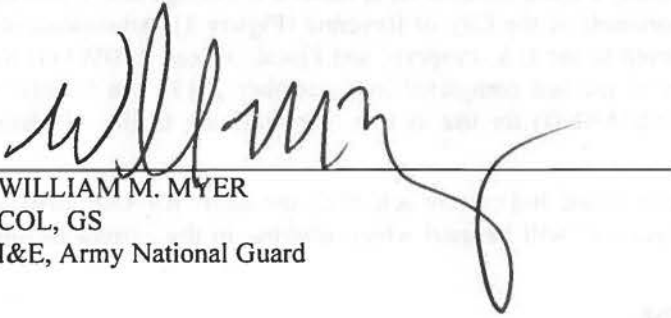
There was no evidence of DoD military munitions or munitions debris (MD) encountered at the MRS during the Remedial Investigation (RI) field work. Additionally, MC-related contamination was not detected at the MRS during the RI field work. Therefore, NFA is the selected remedy for the Atlas Scrap Yard MRS under the Military Munitions Response Program (MMRP) pursuant to CERCLA requirements.

D. STATUTORY DETERMINATION

The results of the RI fieldwork for the Atlas Scrap Yard MRS support the determination that there is no risk associated with exposure to DoD military munitions, or MC-related contamination at the MRS. The

Army has determined that NFA is acceptable for the Atlas Scrap Yard MRS because there is no risk associated with the presence of DoD military munitions or MC-related contamination. The NFA is protective of human health and the environment, and meets the statutory requirements for cleanup standards established in Section 121 of CERCLA. Because there are no risks to human health or the environment associated with DoD military munitions, or MC-related contamination at the MRS, five-year reviews are not required.

E. AUTHORIZING SIGNATURE



WILLIAM M. MYER
COL, GS
I&E, Army National Guard

4 Dec 18
Date

PART II: DECISION SUMMARY

A. SITE NAME, LOCATION, AND DESCRIPTION

The RVAAP, now known as the Camp Ravenna Joint Military Training Center (Camp Ravenna), is located in northeastern Ohio within Portage and Trumbull Counties and is approximately 3 miles east-northeast of the city of Ravenna. The federally owned facility, approximately 11 miles long and 3.5 miles wide, is bounded by a Norfolk Southern railroad line to the north; State Route 5, the Michael J. Kirwan Reservoir, and a CSX railroad line to the south; State Route 534 to the east; and Garret, McCormick, and Berry Roads to the west. The facility is surrounded by the communities of Windham, Garrettsville, Newton Falls, Charlestown, and Wayland. (**Figure 1**).

Administrative accountability of the 21,683-acre facility has been transferred to the USP&FO for Ohio and subsequently licensed to the OHARNG for use as a training site, Camp Ravenna. The restoration program for the facility involves the remediation of areas affected by the activities of the RVAAP.

The Atlas Scrap Yard MRS is a 66.04-acre area located in the south-central portion of Camp Ravenna as shown in **Figure 2**. The MRS overlaps with the RVAAP-50 AOC being investigated under the IRP which extends slightly east and slightly south of the MRS boundaries (**Figure 3**). The Atlas Scrap Yard MRS is being investigated under the MMRP, a similar program to the IRP. The MMRP was established under the Defense Environmental Restoration Program (DERP) to address DoD military munitions located on current and former defense sites. Sites that are eligible under the MMRP are non-operational ranges where military munitions are known or suspected to be present. The Atlas Scrap Yard MRS was determined to be eligible under the MMRP.

B. SITE HISTORY AND ENFORCEMENT ACTIVITIES

The RVAAP was constructed in 1940 and 1941 for assembly/loading and depot storage of ammunition. While serving as an ammunition plant, RVAAP was a U.S. Government-owned and contractor-operated (GOCO) industrial facility. The ammunition plant consisted of 12 munitions assembly facilities, referred to as “load lines.” Load Lines 1 through 4 were used to melt and load 2,4,6-trinitrotoluene (TNT) and Composition B (a mixture of TNT and Research Department Explosive) into large-caliber shells and bombs. Operations on the load lines produced explosive dust, spills, and vapors that collected on the floors and walls of each building. Periodically, the floors and walls were cleaned with water and steam. After cleaning, the “pink water” wastewater, which contained TNT and Composition B, was collected in concrete holding tanks, filtered, and pumped into unlined ditches for transport to earthen settling ponds. Load Lines 5 through 11 manufactured fuzes, primers, and boosters. From 1946 to 1949, Load Line 12 produced ammonium nitrate for explosives and fertilizers; subsequently, it was used as a weapons demilitarization facility.

In 1950, the facility was placed on standby status, and operations were limited to renovation, demilitarization, normal maintenance of equipment, and munitions storage. Production activities resumed from July 1954 to October 1957 and again from May 1968 to August 1972. Demilitarization and production activities were conducted at Load Lines 1, 2, 3, and 12. Demilitarization activities included disassembling munitions, melt out, and recovering explosives using hot water and steam processes. These activities continued through 1992.

In addition to production and demilitarization activities at the load lines, other activities conducted at the RVAAP included the burning, demolition, and testing of munitions. The locations used as burning and demolition grounds consisted of large, open areas and abandoned quarries. Other AOCs associated with the RVAAP include landfills, an aircraft fuel tank testing area, and various industrial support and maintenance facilities (CB&I, 2014).

The Atlas Scrap Yard MRS is a 66.04-acre area located in the south-central portion of Camp Ravenna as shown in **Figure 2**. The MRS was originally used as a camp to house workers during the construction of the installation starting in 1940. After World War II the buildings associated with the camp were

demolished. After 1969, the MRS was used as a storage area and scrap yard for nonexplosive scrap material. The location of the former debris piles of construction materials are shown on **Figure 3** (the debris piles have been removed). Historical aerial photographs indicate that these debris piles and possible munitions stockpiles may have existed alongside the roads within the MRS (HGL, 2017).

During the 2006 IRP AOC sampling event, a potential DoD military munition was encountered in the southwest corner of the MRS; however, the type and condition of the munition could not be verified. The location at which the munition was encountered and its removal was documented in a removal report funded by the Army Materiel Command's (AMC) Joint Munitions Command (JMC). However, the documentation was not provided to the Army and the reported information cannot be verified (e²M, 2007). This encounter was the basis for creating the MRS and initiating further investigation activities under the MMRP, separate from the IRP activities.

There have been no CERCLA enforcement actions related to the Atlas Scrap Yard MRS.

C. COMMUNITY PARTICIPATION

Using the Camp Ravenna community relations program, the Army and the Ohio EPA have interacted with the public through news releases, public meetings, reading materials, and a website. Specific items of the community relations program include the following:

- **Restoration Advisory Board (RAB):** The Army established a RAB in 1996 to promote community involvement in DoD environmental cleanup activities and allow the public to review and discuss the progress with decision makers. Board meetings are generally held two to three times per year and are open to the public.
- **Camp Ravenna Community Relations Plan:** The *Final Community Relations Plan for the Ravenna Army Ammunition Plant Restoration Program in Portage and Trumbull Counties, Ohio* (USACE, 2017) was prepared to establish processes to keep the public informed of activities being conducted as part of the Camp Ravenna restoration program.
- **Camp Ravenna Website:** The Army established a website in 2004 dedicated to the RVAAP restoration program. The website provides information on the history of the RVAAP; areas where DoD military munitions may be present; areas of potential contamination; the cleanup program being implemented; current activities; and a schedule of upcoming events. This website is accessible to the public at www.rvaap.org.

In accordance with Section 117(a) of CERCLA, Section 300.430(f)(2) of the *National Oil and Hazardous Substances Pollution Contingency Plan*, and the *Final U.S. Army Military Munitions Response Program Munitions Response, Remedial Investigation / Feasibility Study Guidance* (Army, 2009) the Army released the NFA PP for the Atlas Scrap Yard MRS (HGL, 2017) to the public in November 2017. The NFA PP and other project-related documents were made available to the public at the Administrative Record maintained at Camp Ravenna and in the two Information Repositories at Reed Memorial Library in Ravenna, Ohio and Newton Falls Public Library in Newton Falls, Ohio. The notice of availability for the NFA PP was sent to the Tribune Chronicle and Record Courier, as specified in the Community Relations Plan (USACE, 2017). The notice of availability initiated the 30-day public comment period beginning November 3, 2017, and ending December 8, 2017.

The Army held a public meeting on November 8, 2017, at the Charlestown Town Hall, 6368 Rock Spring Road, Ravenna, Ohio 44266, to present the NFA PP to the public. At this meeting, representatives of the Army provided information specific to the Atlas Scrap Yard MRS history, investigations, current site conditions, and proposed NFA. Army representatives were also available to answer questions about the results of the munitions response investigations conducted under the MMRP at the Atlas Scrap Yard MRS. A memorandum summarizing the public meeting and a transcript of the public meeting are available to the public and have been included in the Administrative Record. Responses to the comments received at this

meeting and during the public comment period are included in the Responsiveness Summary, which is Part III of this ROD.

The Army considered the input received on the NFA PP when determining that NFA for both DoD military munitions, and MC-related contamination is appropriate for the Atlas Scrap Yard MRS.

D. SCOPE AND ROLE OF RESPONSE ACTION

The overall goal of the munitions response conducted at Camp Ravenna was to address risks to human health and the environment posed by DoD military munitions that may be present and MC-related contamination. The munitions response that the Army conducted did not encounter DoD military munitions or evidence of their presence within the Atlas Scrap Yard MRS. Given there was no evidence that DoD military munitions were present, there was no potential source of MC-related contamination. For this reason, the Army determined there is no source material or impacted environmental media associated with DoD military munitions at Atlas Scrap Yard MRS.

Soil, sediment, and groundwater contamination were identified during a 2006 sampling event within the overlapping IRP AOC, RVAAP-50. This contamination will continue to be addressed under the IRP, pursuant to CERCLA requirements. Although not anticipated, if additional hazards related to historical DoD activities are identified at the Atlas Scrap Yard MRS, they would be addressed under the appropriate restoration program.

E. SITE CHARACTERISTICS

This section described the physical characteristics, previous investigations, nature and extent of contamination, and conceptual site model (CSM) for the Atlas Scrap Yard MRS.

E.1 Physical Characteristics

This section describes the physical characteristics such as topography, geology, hydrogeology, and ecological characteristics that contributed to identifying potential transport pathways, receptors and exposure scenarios used to evaluate health and ecological risks.

E.1.1 Topography/Physiography

Camp Ravenna is located within the Southern New York section of the Appalachian Plateaus physiographic province characterized by rolling hills, incised streams, and dendritic drainage patterns. Past glacial activity created bogs, lakes, and other wetland areas (e²M, 2008). The topography of the Atlas Scrap Yard MRS is described as relatively flat with gently rolling hills that allow water to drain towards the wetland area in the northeast. Elevation of the Atlas Scrap Yard MRS is approximately 980-feet above mean sea level (amsl) (CB&I, 2014).

E.1.2 Soils and Geology

Camp Ravenna is located atop Mississippian- and Pennsylvanian-age bedrock strata overlain by unconsolidated glacial deposits of varying thickness. The Atlas Scrap Yard MRS is located over the Sharon Sandstone Member with a bedrock elevation of 950 feet amsl. Depth to bedrock ranges from just below ground surface to approximately 20 to 29 feet below ground surface (CB&I, 2014).

The naturally occurring soil types consist of deep, poorly drained Mahoning with 2 to 6 percent slopes and Trumbull silt loam with 0 to 2 percent slopes. Mahoning silt loam makes up the majority of the interior of the MRS with the Trumbull silt loam is present at the southwest corner of the MRS. Permeability of the Mahoning soil type ranges from 6.0×10^{-7} to 1.4×10^{-3} centimeters/second resulting in saturated conditions in the winter and spring. Trumbull silt loam is a deep, poorly drained, nearly level soil. These soils are relatively level to gently sloping with rapid water runoff creating erosion hazards and seasonal wetness. (CB&I, 2014).

E.1.3 Hydrogeology

Camp Ravenna is located within the Ohio River Basin with a major surface stream running adjacent to the western portion of the facility flowing to the Mahoning River before joining the Michael J. Kirwan Reservoir. After leaving the reservoir, the west branch joins the Mahoning River east of the facility. Surface water at the Atlas Scrap Yard MRS drains towards the wetland area at the northeast portion of the MRS (CB&I, 2014).

E.1.4 Ecology

Camp Ravenna is home to a range of habitats, vegetation types, and animal species. The Atlas Scrap Yard MRS is a shrub-dominated area with some tree-dominated areas. Vegetation at the MRS consist of herbaceous fields as well as oak and maple swamp forests. Man-made improvements at the MRS include a network of unpaved roads throughout the MRS (CB&I, 2014).

The Camp Ravenna Integrated Natural Resources Management Plan and U.S. Fish and Wildlife Service (USFWS) Threatened and Endangered Species List (TESL) indicate that one federally-listed threatened species, the Northern Long-eared Bat, is known to reside within Camp Ravenna (OHARNG, 2014) (USFWS, 2018). In addition, the Ohio Department of Natural Resources (ODNR) has identified several state-listed threatened and endangered plant and animal species. Twelve state listed endangered species (1 mammal, 1 fish, 2 insect, 2 bird, and 6 plant species) and eight state listed threatened species (2 bird, 1 insect, 1 mammal, 4 plant species) are included on the Camp Ravenna Rare Species List (OHARNG, 2014). No confirmed sightings of these species within the Atlas Scrap Yard MRS have been reported and no critical habitats are present within the MRS (CB&I, 2014).

E.2 Site Investigations

E.2.1 Site Inspection (SI)

In 2007, the Army completed a Site Inspection (SI) at Camp Ravenna that included the Atlas Scrap Yard MRS. The Army conducted instrument-assisted visual surveys for DoD military munitions along meandering paths. The Army conducted the surveys in the south-central section of the MRS where DoD military munitions had been reported to be present. The Army also conducted additional surveys around the former debris piles in the northern and eastern portions of the MRS as shown on **Figure 4**.

The Army did not encounter DoD military munitions, MD, or other materiel that would be considered material potentially presenting an explosive hazard (MPPEH) during SI field activities. The presence of other debris (e.g., construction debris) limited where data could be collected. Subsurface anomalies were detected throughout the accessible survey area and were concentrated around the piles of debris. Instrument interference from the metal scrap in the debris piles could have been significant. Very few subsurface anomalies were recorded in the east-central portion of the MRS. Although DoD military munitions were not encountered, the Army's Final SI Report recommended further investigation of the MRS for the presence of DoD military munitions under the MMRP (e²M, 2008).

After completing the fieldwork portion of the SI, Camp Ravenna informed the Army of a suspected burial area containing 40-millimeter (mm) fragments and casings that was located near the central portion of MRS (**Figure 4**). Because disclosure of the suspected 40-mm burial site occurred after completion of SI's field work the area was not investigated under the SI. However, the SI Report's documented this new anecdotal evidence in its text and figures and recommended the area be investigated during future characterization efforts (e²M, 2008).

E.2.2 Remedial Investigation (RI)

The Army conducted an RI at the Atlas Scrap Yard MRS to identify and bound areas where DoD military munitions were potentially present, and characterize the nature and extent of MC-related contamination

potentially present within the MRS. The RI fieldwork incorporated the findings of the Final Historical Records Review, the results of the SI, and the information about the suspected 40-mm burial area. Field activities included the following (**Figure 5**):

- Digital geophysical mapping was performed over 16.7 miles, or 6.1 acres, located throughout the project area.
- A total of 3,185 anomalies were identified for intrusive investigation. Sixty single-point anomalies were determined to have a source on the surface and did not require excavation. Additionally, 34 anomalies could not be reacquired. A total of 3,090 items were intrusively investigated by hand digging.
- The high-density areas were investigated by trenching. Six trenches were excavated at the suspected 40-mm burial area, and 27 trenches were dug at the 14 other high-density areas. A total of 12,851 pounds of other debris (e.g., construction debris) was removed from the trenches.
- There were no DoD military munitions or MD encountered during these activities; therefore, sampling for MC-related contamination was not warranted.

Based on the results of the RI fieldwork, the project team concluded that DoD military munitions were not present and the nature and extent of MC-related contamination at the Atlas Scrap Yard MRS (**Figure 5**) has been adequately characterized. Because DoD military munitions were not encountered, potential sources for a release of MC-related contamination were not identified within the MRS. The MRS was recommended for NFA for DoD military munitions and MC-related contamination (CB&I, 2014).

E.3 Nature and Extent of Contamination

Data gathered by the Army during the SI and subsequent RI of the Atlas Scrap Yard MRS effectively characterized the nature and extent of DoD military munitions and MC-related contamination at the MRS. Based on the information presented in Part II, Sections A through E, it can be concluded that no further investigation is necessary at the Atlas Scrap Yard MRS. As outlined in the RI Report, there was no evidence that DoD military munitions or MD were present at the Atlas Scrap Yard MRS. As such, explosive hazards associated with military munition were not present and there were no sources for a release of MC-related contamination. Therefore, neither DoD military munitions nor MC-related contamination posed a risk at the Atlas Scrap Yard MRS (CB&I, 2014).

E.4 Conceptual Site Model (CSM)

The CSM discussion includes areas where DoD military munitions may be present, sources of contamination, release mechanisms, migration pathways, and potential receptors identified for the Atlas Scrap Yard MRS in support of the human health and ecological risk assessments.

E.4.1 Primary and Secondary Contaminant Sources and Release Mechanisms

The Atlas Scrap Yard MRS was used as a storage area for nonexplosive scrap; however, the Historical Record Review identified anecdotal evidence suggesting that DoD military munitions may have been disposed of at the Atlas Scrap Yard MRS. After completion of the SI, a suspected burial area containing 40- mm fragments and casings that was located near the central portion of the Atlas Scrap Yard MRS was reported. This evidence was considered the primary source of potential explosive hazards at the Atlas Scrap Yard MRS. An associated secondary source of MC-related contamination would be the release of MC contamination as a result of suspected munitions burial or disposal activities or other DoD military munitions remaining at the Atlas Scrap Yard MRS. The RI did not encounter DoD military munitions or MD either on the ground surface or in the subsurface during intrusive investigation of 33 trenches and 3,185 single point anomalies. Because DoD military munitions were not encountered during the RI, MC sampling was not warranted. Based on the fact that DoD military munitions were not encountered at the Atlas Scrap Yard MRS, a release of MC-related contamination had not occurred (CB&I, 2014).

The release mechanisms evaluated during the RI included the potential for previous storage or disposal of military munitions in the MRS that could result in munitions exposed on the surface, mixed with other debris on the surface, buried in subsurface soil, or within the surface water in both the accessible and inaccessible areas of the MRS (CB&I, 2014).

E.4.2 Contaminant Migration Pathways

The fact neither DoD military munitions nor MD were encountered during SI and RI field activities provides evidence that MC-related contamination is not present in the surface or subsurface of the Atlas Scrap Yard MRS. The RI concluded that exposure pathways for surface and subsurface soils and surface water were incomplete (CB&I, 2014).

E.4.3 Potential Human Receptors and Ecological Receptors

The likely human receptors identified for the Atlas Scrap Yard MRS include facility personnel, contractors, occasional trespassers, and National Guard trainees. Environmental receptors at the MRS include aquatic biota, terrestrial invertebrates (earthworms), voles, shrews, rabbits, robins, foxes, hawks, muskrats, ducks, minks, and benthic invertebrates (insect larvae, crayfish, snails, clams and bivalves) (CB&I, 2014).

F. CURRENT AND POTENTIAL FUTURE LAND USES

Current activities at the Atlas Scrap Yard MRS includes maintenance, natural resource management, and environmental sampling. Future land use activities are expected to stay the same in the future with the addition of military training (HGL, 2017).

G. SUMMARY OF SITE RISKS

Munitions and Explosives of Concern (MEC) Hazard Assessment (HA), Human Health Risk Assessment (HHRA), and Ecological Risk Assessment (ERA) estimates risks posed to human and ecological receptors based on site characteristics, results of previous investigations, and evaluation of the conceptual site model.

G.1 Munitions and Explosives of Concern (MEC) Hazard Assessment (HA)

As part of the RI, the Army evaluated explosive safety hazards at the Atlas Scrap Yard MRS using the MEC HA. Because DoD military munitions were not encountered at the Atlas Scrap yard MRS during either the 2007 SI or the subsequent 2011 RI, the Army determined that explosive safety hazards associated with such munitions were not present. Therefore, the Army determined that evaluation of the Atlas Scrap Yard MRS in a MEC HA was not warranted (CB&I, 2014).

G.2 Human Health Risk Assessment (HHRA) and Ecological Risk Assessment (ERA)

The purpose of the HHRA is to document whether MRS conditions may pose a risk to current or future human receptors and to identify which, if any, MRS conditions need to be addressed further in the CERCLA process. An ERA evaluates the potential for adverse effects posed to ecological receptors from the release of MC-related contamination at a MRS.

Because the Army did not encounter DoD military munitions, concentrated areas of MD or evidence of munition use during either the 2007 SI or 2011 RI conducted at the Atlas Scrap Yard MRS, media sampling for MC-related contamination was not warranted. Therefore, the Army did not perform an HHRA or an ERA for the MRS and determined that there was no risk from MC-related contamination at the MRS (CB&I, 2014).

H. DOCUMENTATION OF NO SIGNIFICANT CHANGE

The NFA PP for the Atlas Scrap Yard MRS (HGL, 2017) was released for public comment on November 3, 2017. The PP recommended NFA under the MMRP and pursuant to CERCLA requirements for the Atlas Scrap Yard MRS. After the public comment period, no significant changes regarding the selected remedy, as originally identified in the NFA PP, were necessary or appropriate.

PART III: RESPONSIVENESS SUMMARY FOR PUBLIC COMMENTS ON THE PROPOSED PLAN FOR RVAAP-050-R-01 ATLAS SCRAP YARD

A. Overview

In November 2017, the Army released the NFA PPs and hosted a public meeting for Atlas Scrap Yard, Block D Igloo-D, Landfill North of Winklepeck, and Ramsdell Quarry Landfill Area 1 North MRSs. The 30-day public comment period was held from November 3, 2017 to December 8, 2017.

B. Summary of Public Comments and Agency Responses

No site-specific verbal comments were received during the public meeting. The transcript from the meeting was incorporated into the Administrative Record.

B.1 Oral Comments from Public Meeting

No oral comments or questions were received from members of the public at the November 2017 public meeting.

B.2 Written Comments from Public Meetings

No written comments or questions were received from members of the public at the November 2017 public meeting.

B.3 Telephone Comments from Public

Various telephone inquiries were received from members of the public following publication of the news releases and prior to the November 8, 2017 public meeting. A summary of each inquiry is provided below.

B.3.1 Storage and Disposal Activities at Each MRS

Comment: A local resident contacted Ms. Kathryn Tait on October 25, 2017 inquiring about the plans for the four MRSs listed in the public notice and asking what would be stored and disposed of at the MRSs.

Response: Ms. Tait briefly discussed the history of these MRSs, the current and future land uses, and the meaning of the No Further Action alternative. During the discussion, Ms. Tait described the current and future land use at each MRS as military training and stated no munitions would be stored or disposed of at these MRSs in the future. In closing, Ms. Tait suggested if the local resident had additional questions that he contact her again, visit RVAAP.org, and/or attend the November 8, 2017 public meeting.

B.3.2 Location of the Public Meeting

Comment: A council woman from the City of Kent contacted Ms. Kathryn Tait on October 26, 2017 for clarification on the location of the November 8, 2017 public meeting.

Response: Ms. Tait confirmed that the November 8, 2017 public meeting would be held at the Charlestown Hall at 6 p.m. and provided the physical address of the building location to the caller.

B.3.2 Synopsis of Conclusions and Proposed Alternatives

Comment: The council woman from the City of Kent noted in the previous comment was unable to attend the November 8, 2017 public meeting and contacted Ms. Kathryn Tait on November 9, 2017 to discuss the conclusions and proposed alternatives for each MRS.

Response: Ms. Tait returned the phone call on November 13, 2017, and summarized the conclusions and proposed alternatives for each MRS. Ms. Tait indicated that no explosive hazards have been found at any MRS, that all four MRSs were proposed for NFA, and that the Ohio EPA concurs with NFA. Ms. Tait suggested the council woman review the slide presentation for a

synopsis of each MRS including the history and the proposed alternatives. Ms. Tait provided the council woman with a copy of the slide presentation by email for her review.

C. Technical and Legal Issues

There were no technical or legal issues raised during the public comment period.

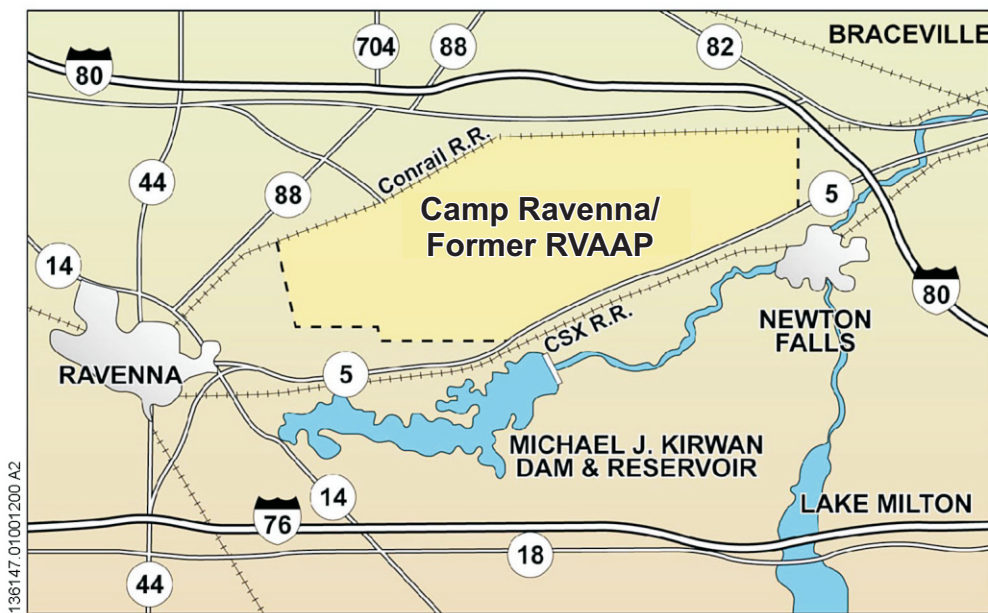
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FIGURES

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 Source: CB&I

Legend

 Camp Ravenna/Former RVAAP

Figure 1
Location Map
Camp Ravenna/
Former RVAAP
Portage and Trumbull
Counties, Ohio



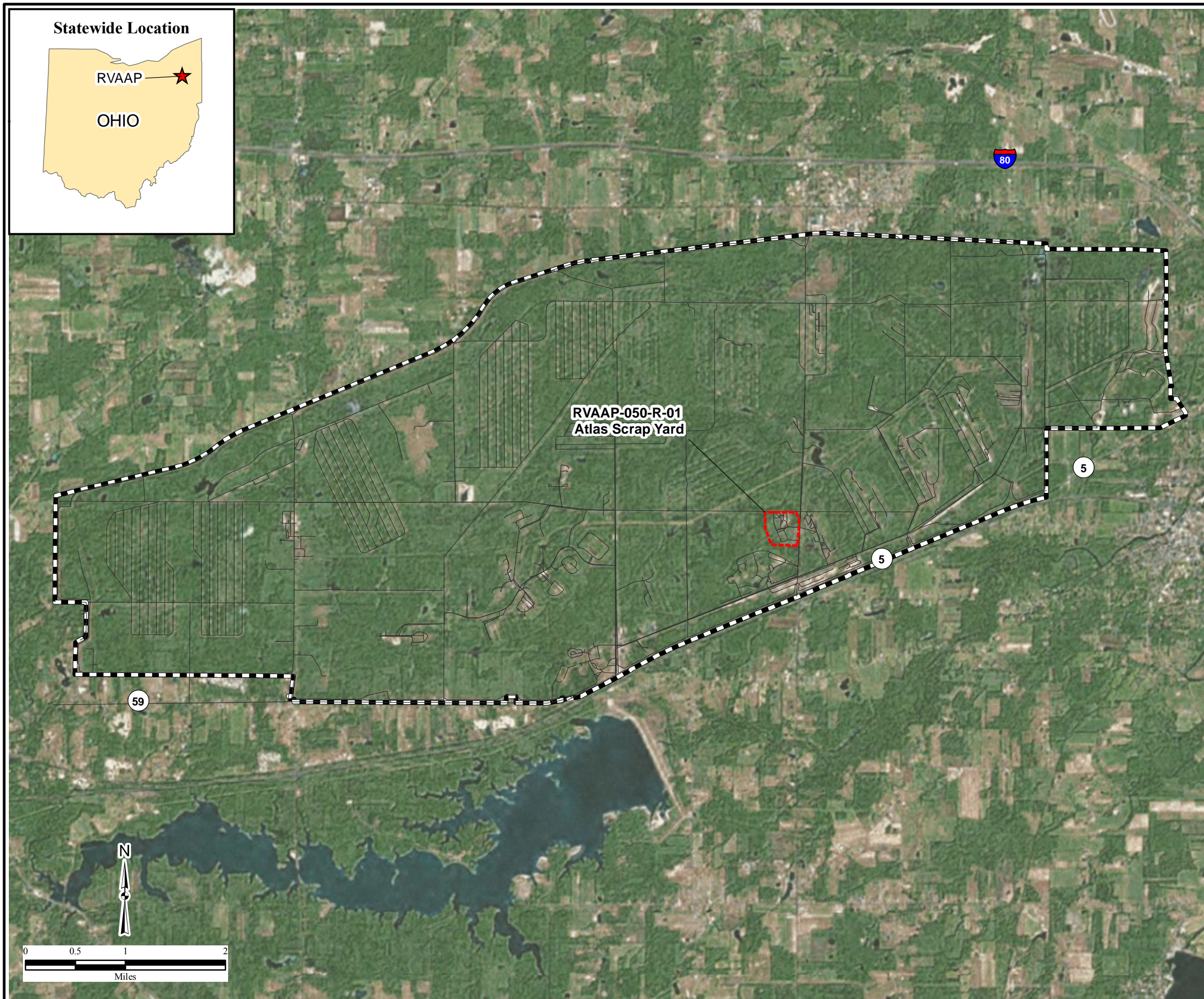
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Figure 2
Atlas Scrap Yard
MRS Location
Camp Ravenna/Former RVAAP
Portage and Trumbull Counties, Ohio

Legend

- Road
- ▭ MRS Boundary
- ▭ Installation Boundary

Notes:
MRS=munitions response site
RVAAP=Ravenna Army Ammunition Plant



Statewide Location







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1/4/2018 JAR
Source: HGL, CB&I, USACE, e2M
ArcGIS Online Imagery



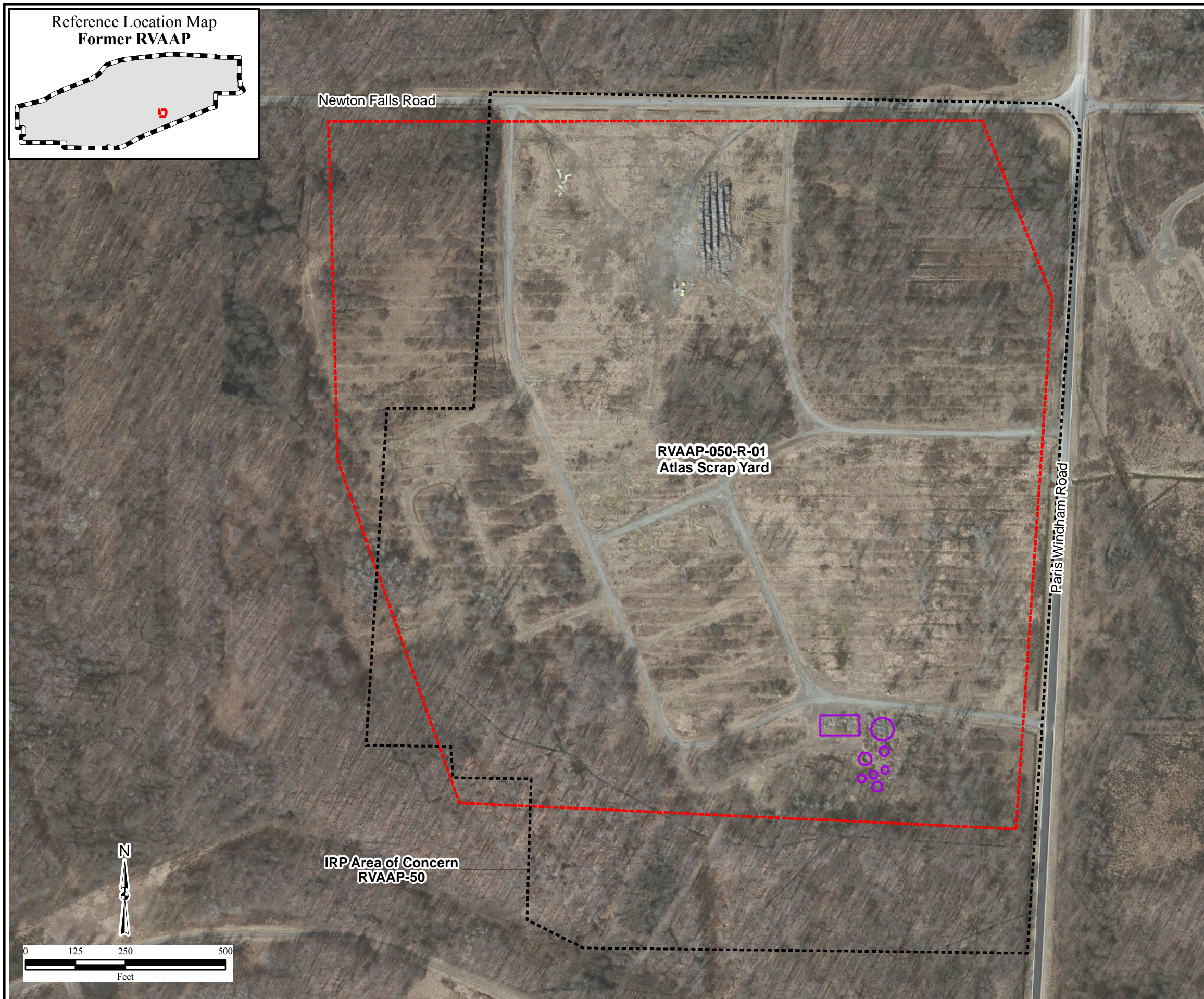
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Figure 3
Atlas Scrap Yard MRS Boundary
Camp Ravenna/Former RVAAP
Portage and Trumbull Counties, Ohio

Legend

-  Former Debris Area
-  IRP Area of Concern Boundary
-  MRS Boundary
-  Installation Boundary

Notes:
IRP=Installation Restoration Program
MRS=munitions response site
RVAAP=Ravenna Army Ammunition Plant

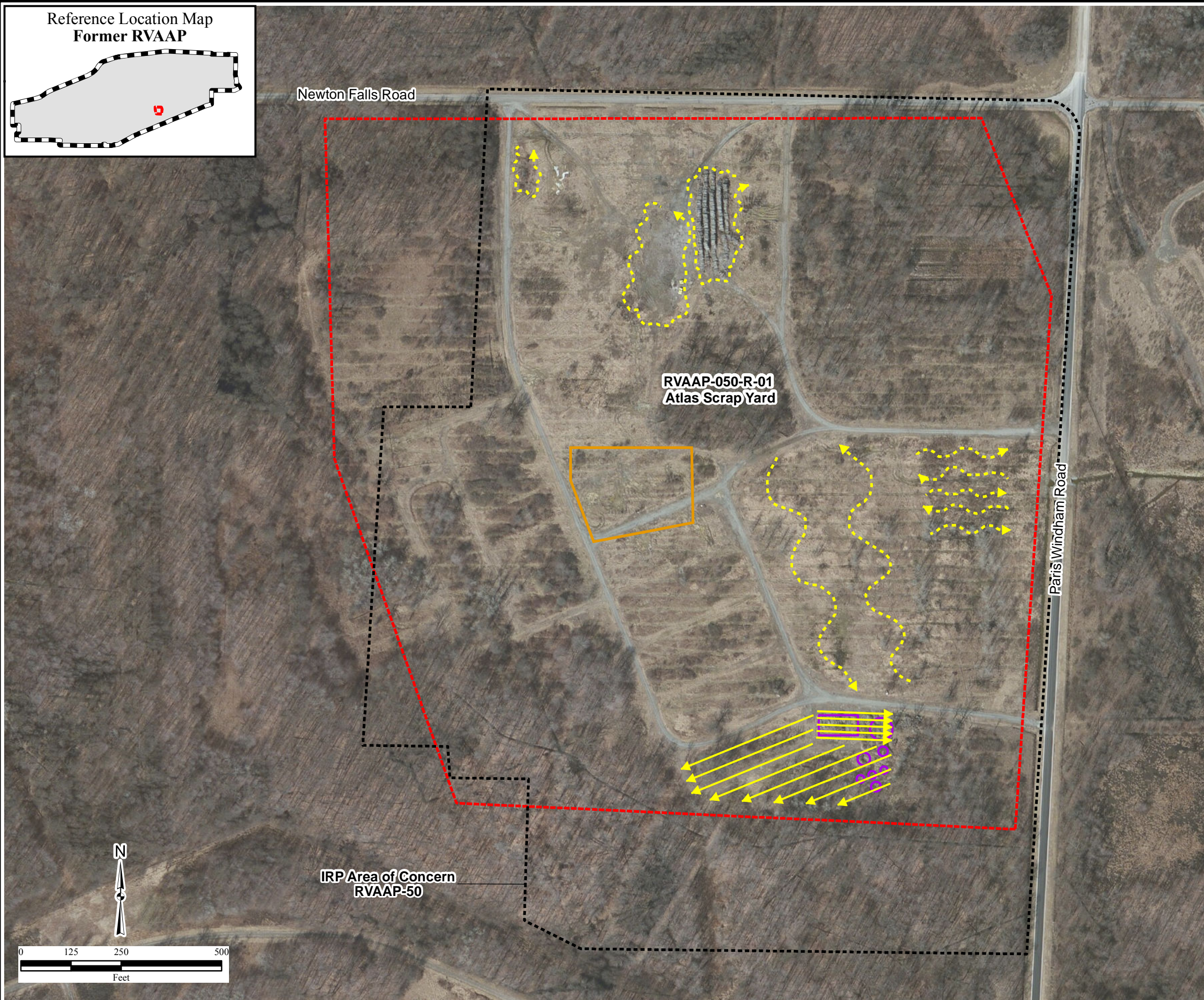


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Source: HGL, CB&I, USACE, eM
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Figure 4
Atlas Scrap Yard MRS
2008 Site Inspection Results
Camp Ravenna/Former RVAAP
Portage and Trumbull Counties, Ohio



Legend

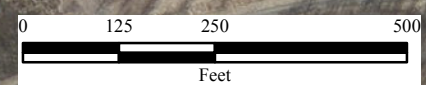
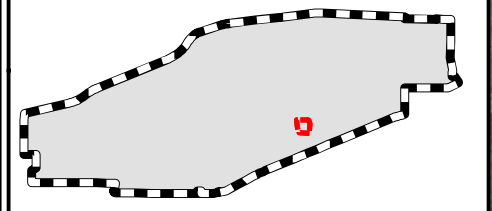
- Meandering Path Survey Transect
- Line Abreast Survey Area
- Former Debris Area
- Suspected Location of Buried 40 mm Fragmentation Shell
- IRP Area of Concern Boundary
- MRS Boundary
- Installation Boundary

Notes:
IRP=Installation Restoration Program
MRS=munitions response site
RVAAP=Ravenna Army Ammunition Plant

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Source: HGL, CB&I, USACE, e3M
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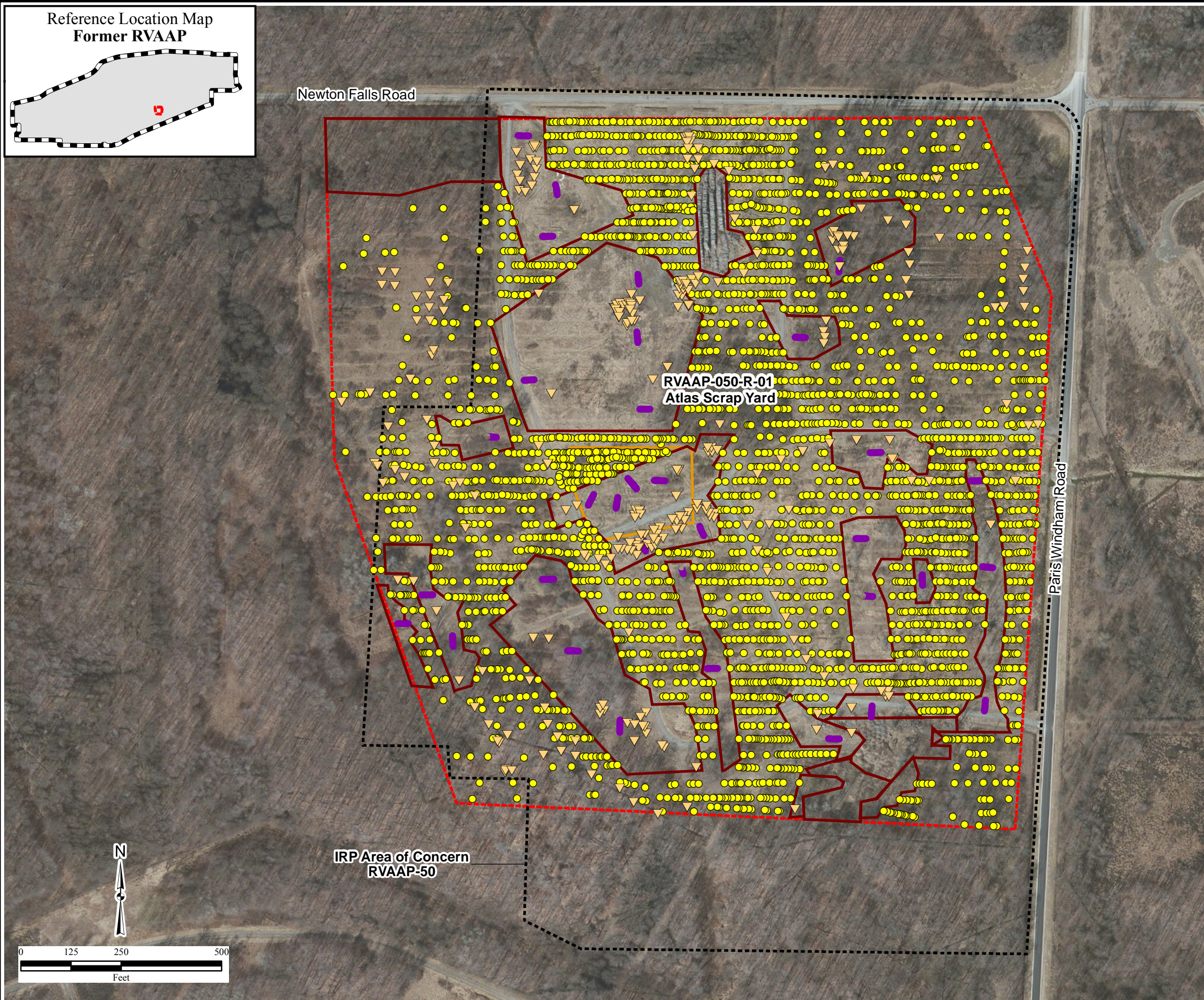


Reference Location Map
Former RVAAP











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Figure 5
Atlas Scrap Yard MRS
2014 Remedial Investigation Results
Camp Ravenna/Former RVAAP
Portage and Trumbull Counties, Ohio

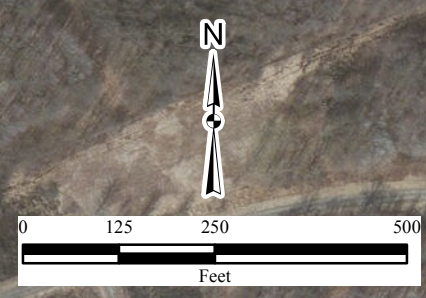
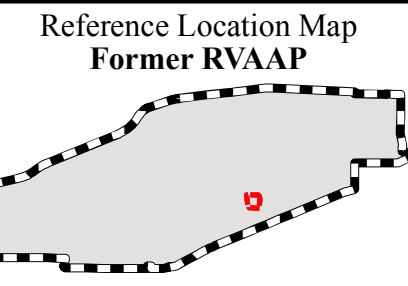


Legend

-  Anomaly Location Investigated
(No Military Munitions
or MD Items Identified)
-  Cultural Feature/ Surface Metal/
Natural Site Feature
-  Trench Operations Completed
(33 Locations, No Military Munitions or
MD Items Identified)
-  High Anomaly Density Area
-  Suspected Location of Buried
40 mm Fragmentation Shell
-  IRP Area of Concern Boundary
-  MRS Boundary
-  Installation Boundary

Notes:
IRP=Installation Restoration Program
MD=Munitions Debris
mm=millimeter
MRS=munitions response site
RVAAP=Ravenna Army Ammunition Plant

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Source: HGL, CB&I, USACE, eM
ArcGIS Online Imagery



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Appendix A
Notice of Availability of the Proposed Plan

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Affidavit of Publication, Tribune Chronicle, October 22 and 29, 2017

NEWS RELEASE
Camp Ravenna Joint Military Training Center
 Camp Ravenna Environmental Office
 1438 State Route 534 SW - Newton Falls, OH 44444
 614-336-6136

**Public meeting to be held Wednesday, November 8, 2017
 for Army National Guard Release of
 Proposed Plans for Munitions and Explosives of Concern and
 Munitions Constituents at four Munitions Response Sites:**
**Ramsdell Quarry Landfill Area 1, North
 Atlas Scrap Yard
 Landfill North of Winklepeck
 Block D Igloo-TD**

Ravenna - The Army National Guard, in consultation with the Ohio Environmental Protection Agency, submits for public review and comments four (4) Proposed Plans for munitions and explosives of concern and munitions constituents with former national defense program activities at the former Ravenna Army Ammunition Plant (RVAAP) in Portage and Trumbull counties, Ohio. The Ramsdell Quarry Landfill Area 1, North; Atlas Scrap Yard; Landfill North of Winklepeck; and Block D Igloo-TD are Munitions Response Sites (MRSs) within the former RVAAP (now known as Camp Ravenna) in Portage and Trumbull Counties, Ohio. These MRSs are being addressed under the Military Munitions Response Program (MMRP) in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The Proposed Plans present the current status and information regarding the MRSs. The Proposed Plans detail the recommendation for No Further Action at each MRS and provide the rationale for these recommendations. On Wednesday November 8, 2017, a public meeting will be held at the Charlestown Township Hall at 6366 Rock Spring Road, Ravenna, Ohio 44296 beginning at 6:00 p.m., with an informal open house when technical staff will be available to answer questions. At 6:30 p.m., the Army National Guard will briefly describe the assessment of the MRSs, present the No Further Action recommendation, and then request verbal comments from the public. Written comments regarding this recommendation may be submitted to the Army National Guard during the 30-day comment period from November 3, 2017 to December 8, 2017. All written comments should be addressed to Camp Ravenna Environmental Office, 1438 State Route 534 SW, Newton Falls, OH 44444 or sent via email to Kathryn.s.tan.nga@mail.mil. In accordance with CERCLA, the No Further Action recommendation presented in the Proposed Plans is also presented in earlier remedial investigation reports. All reports are now available for public review at the RVAAP Restoration Program Information Repository at the Reed Memorial Library (167 East Main Street, Ravenna) and the Newton Falls Public Library (204 South Canal Street, Newton Falls). The reports are also available online at www.rvaap.org. The final remedy for each MRS will be selected based, in part, on public comments. In coordination with Ohio Environmental Protection Agency, the Army National Guard will select a final remedy after reviewing and considering all public comments submitted during the 30-day public comment period from November 3, 2017 to December 8, 2017. The Army National Guard encourages the public to review and comment on the recommendation presented in this document. For more information or to participate in the review, please visit the RVAAP Restoration Program website (www.rvaap.org) or call Katie Tan at 614-336-6136.

#265-2T - October 22 & 29, 2017 • #WCH033481

PROOF OF PUBLICATION

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 TRUMBULL COUNTY

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 NOTARY PUBLIC

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NEWS RELEASE
Camp Ravenna Joint Military Training Center
Camp Ravenna Environmental Office
1438 State Route 534 SW – Newton Falls, OH 44444
614-336-6136

**Public meeting to be held Wednesday, November 8, 2017
for Army National Guard Release of
Proposed Plans for Munitions and Explosives of Concern and
Munitions Constituents at four Munitions Response Sites:
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Atlas Scrap Yard
Landfill North of Winklepeck
Block D Igloo-TD**

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Affidavit of Publication, Record Courier, October 22 and 29, 2017

Proof of Publication

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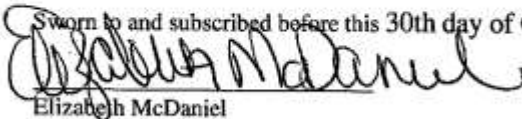
30 Record-Courier a newspaper printed and published in the city of Kent, and of General circulation in the County of Portage, State of Ohio, and personal knowledge of the facts herein stated and that the notice hereto annexed was Published in said newspapers for 2 insertions on the same day of the week from and after the 22nd day of October, 2017 and that the fees charged are legal.



Name of Account: HydroGeoLogic Inc
Ad Number: 12376892
No. of Lines: 72

Day(s) Published: 10/22, 10/29.

Sworn to and subscribed before this 30th day of October, 2017.



Elizabeth McDaniel
Notary Public
Commission Expires June 19, 2021

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