

**Final**  
**Remedial Design for Soil**  
**at RVAAP-51 Dump Along Paris-Windham Road**

**Camp James A. Garfield Joint Military Training Center**  
**Former Ravenna Army Ammunition Plant**  
**Portage and Trumbull Counties, Ohio**

**Contract No. W912QR-18-C-0013**

*Prepared for:*



U.S. Army Corps of Engineers  
Louisville District

*Prepared by:*



**February 27, 2019**

**REPORT DOCUMENTATION PAGE***Form Approved  
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***Prepared by:***



**February 27, 2019**



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

March 8, 2019

RE: US Army Ammunition Plt RVAAP  
Remediation Response  
Project Records  
Remedial Response  
Portage County  
267000859248

Mr. David Connolly  
Army National Guard Directorate  
Environmental Programs Division  
ARNGD-ILE -CR  
111 South George Mason Drive  
Arlington, VA 22204

**Subject: Approval of the "Final Remedial Design for Soil at RVAAP-51 Dump along Paris-Windham Road" Dated February 27, 2019**

Dear Mr. Connolly:

The Ohio Environmental Protection Agency (Ohio EPA) has received the "Final Remedial Design for Soil at RVAAP-51 Dump along Paris-Windham Road" at the Former Ravenna Army Ammunition Plant, Ravenna, Ohio. This document was received at Ohio EPA, Northeast District Office (NEDO), Division of Environmental Response and Revitalization (DERR) on March 4, 2019. The report was prepared for the Army National Guard Directorate through the U.S. Army Corps of Engineers, Louisville District by Chenega Tri-Services, LLC.

The final document was reviewed by personnel from Ohio EPA, DERR. Pursuant to the Director's Findings and Orders of June 2004, paragraph 39 (b), Ohio EPA considers the document final and approved.

If you have any questions, please call me at (330) 963-1292.

Sincerely,

Kevin M. Palombo  
Environmental Specialist  
Division of Environmental Response and Revitalization

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MAR 9 8 2019

KP/sc

cc: Bob Prinic, Ohio EPA, NEDO, DERR  
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Tim Christman, Ohio EPA, Central Office, DERR  
Rebecca Shreffler, Chenega Tri-Services, LLC  
Kevin Sedlak, ARNG  
Katie Tait, OHARNG RTLS  
Craig Coombs, USACE, Louisville District  
Nat Peters, USACE, Louisville District

## DOCUMENT DISTRIBUTION

for the

Final Remedial Design for Soil at RVAAP-51 Dump Along Paris-Windham Road

Camp James A. Garfield Joint Military Training Center  
Former Ravenna Army Ammunition Plant  
Portage and Trumbull Counties, Ohio

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AR = Administrative Record

ARNG = Army National Guard

ARNG-IED-CR = Army National Guard – Installation Environmental Division – Cleanup Restoration

DERR = Division of Environmental Response and Revitalization

NEDO = Northeast Ohio District

OHARNG = Ohio Army National Guard

Ohio EPA = Ohio Environmental Protection Agency

USACE = U.S. Army Corps of Engineers

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## LIST OF ACRONYMS AND ABBREVIATIONS

ACM	Asbestos Containing Material
AOC	Area of Concern
AR	Administrative Record
ARNG	Army National Guard
Camp James A. Garfield	Camp James A. Garfield Joint Military Training Center
Camp Ravenna	Camp Ravenna Joint Military Training Center
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Chemical of Concern
ERA	Ecological Risk Assessment
FFS	Focused Feasibility Study
FYR	Five Year Review
LUC	Land Use Control
MRS	Munitions Response Site
NFA	No Further Action
OAC	Ohio Administrative Code
Ohio EPA	Ohio Environmental Protection Agency
OHARNG	Ohio Army National Guard
O&M	Operations and Maintenance
PMP	Property Management Plan
PP	Proposed Plan
RA	Remedial Action
RD	Remedial Design
ROD	Record of Decision
RVAAP	Ravenna Army Ammunition Plant
SC	Site Characterization
USACE	United States Army Corps of Engineers

NOTE: Camp Ravenna Joint Military Training Center (Camp Ravenna) was renamed as Camp James A. Garfield Joint Military Training Center (Camp James A. Garfield) on October 18, 2018.

## **SECTION 1.0 INTRODUCTION**

This Remedial Design (RD) describes the requirements to implement the chosen remedy for soil (Alternative 2 – Land Use Controls (LUCs) at RVAAP-51 Dump Along Paris Windham Road. Surface Water and Sediment achieved No Further Action per the Final Record of Decision (ROD) dated September 2017. Additional information about the selected remedy is documented in the following:

- Final Proposed Plan (PP) for Soil, Sediment and Surface Water for RVAAP-51 Dump Along Paris-Windham Road. United States Army Corps of Engineers (USACE). 29 September 2016.
- Final Record of Decision for Soil, Sediment and Surface Water for RVAAP-51 Dump Along Paris-Windham Road. USACE. 25 September 2017.

The chosen Alternative was Alternative 2 LUCs as stated in the ROD. Alternative 2 contains provisions to implement specific LUCs at the AOC in order to prevent exposure to polycyclic aromatic hydrocarbons (PAHs) chemicals of concern (COCs) in shallow surface soils for the Residential Receptor and Asbestos in soil. A description of the LUCs to be implemented at the Area of Concern (AOC) is provided in Section 2.0. This RD presents the specifics of the LUCs to be implemented and maintained at the AOC.

### **1.1 Site Description**

The Dump Along Paris-Windham Road is located in the east-central portion of RVAAP, along a steep embankment on the west side of Paris-Windham Road between the bridge over Sand Creek and the intersection of Paris-Windham Road with Remalia Road. The AOC was used as an open dump for a variety of miscellaneous construction and demolition material, including asbestos containing material (ACM) which included transite roofing and siding, laboratory bottles and drums, concrete, brick, glass, scrap metal, fencing, and wood debris. There are no records indicating the quantities of material dumped at the AOC or the dates of operation.

The former dump was approximately 400 ft long by 30 ft wide and slopes east to west, away from Paris-Windham Road. The slope face ranges 40–60 degrees from horizontal. No permanent surface water features are present at the AOC. Surface water occurs only intermittently as storm water runoff in the drainage swale located at the base of the slope face of the dump during and after rainfall events and periods of snow melt. Surface water runoff follows the topography and flows in a westerly direction through a drainage swale at the base of the dump slope, entering Sand Creek. Sand Creek is located to the west and north at distances ranging from approximately 30 ft (north end of the AOC) to 170 ft (southcentral portion of the AOC). The Sand Creek floodplain occupies the land between the dump and Sand Creek.

### **1.2 Summary of Previous Environmental Remedial Actions**

A limited Remedial Design/Remedial Action (RD/RA) was initiated in April 2003 at the AOC and was conducted in accordance with Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to mitigate risks related to potential contact with exposed waste material. The limited RD/RA consisted of removal and offsite disposal of surface debris, subsurface debris, and visible transite without undermining and compromising the integrity of Paris-Windham Road (MKM 2004). Figure 2 shows the areas sampled and excavated for the limited RD/RA. This figure was originally presented as Figure 3-1 in the *Final Site Characterization Plan and Focused Feasibility Study for RVAAP-51 Dump Along Paris-Windham Road*, prepared by the U.S. Army Corps of Engineers in 2015.

During confirmation sampling activities conducted prior to placing the soil cover for the RA, additional transite debris was found in the excavated areas adjacent to Paris-Windham Road on the southern portion



of the AOC. The additional transite material was subsequently covered in place during AOC restoration activities so that additional excavation activities would not undermine the road.

The results of confirmation sampling also verified the presence of benzo(a)pyrene and dibenzo(a,h)anthracene in shallow surface soil. These levels exceed Facility-Wide Cleanup Goal concentrations for the Resident Receptor. The concentrations of COCs at the AOC are within the Commercial/Industrial Use Standards.

The excavation area was restored to grade in November 2003 using a combination of clean hard fill and approved soil backfill. A layer of clean hard fill was installed first for stability followed by a minimum of two feet of soil backfill material for cover.

After the limited RD/RA was completed, risk at the AOC was further evaluated through a Final Site Characterization (SC) and Focused Feasibility Study (FFS). This SC/FFS evaluated soil, sediment, and surface water at the Dump Along Paris-Windham Road. Permanent surface water and sediment are not present at the AOC; therefore, NFA is required for these media and remedial alternatives only addressed soil (inclusive of dry sediment). Further, the ecological risk assessment (ERA) recommended NFA for soil and surface water with respect to ecological receptors. Based on the results of the SC/FFS, the PP and ROD requires that LUCs be implemented due to the asbestos and COCs remaining in shallow soil

### **1.3 Community Involvement and Regulatory Approval**

*The Proposed Plan for Soil, Sediment and Surface water for RVAAP-51 Dump Along Paris-Windham Road* (USACE, 2016) was presented to the public during a public meeting on November 29, 2016. At this meeting, representatives of the Army National Guard provided information and were available to answer any questions. A transcript of the public meeting is available to the public and has been included in the Administrative Record. No verbal comments were received at this meeting and no written comments were received during the public comment period.

*A Record of Decision for Soil, Sediment and Surface Water for RVAAP-51 Dump Along Paris-Windham Road* (USACE 2017) documented the selected remedial action alternative to implement LUCs (described in Section 2.0). The Ohio EPA approved the Final ROD for RVAAP-51 Dump Along Paris-Windham Road in a letter dated October 30, 2017.

## **SECTION 2.0 LUCS TO BE IMPLEMENTED**

The Alternative (Alternative 2 – LUCs) to be implemented at the AOC includes the following:

- Development of a Remedial Design,
- Signs and boundary markers (Seibert stakes) posted at least every 300 feet along the AOC perimeter,
- Digging Restrictions,
- General LUC Awareness Training,
- Annual Inspection, and
- Five-year Reviews in accordance with CERCLA.

### **2.1 Signs and Boundary Markers**

Seibert stakes are used in military training areas to mark off-limit or sensitive areas. Seibert stakes consist of 2” PVC Schedule 40 (2-3/8” outer diameter with 2” inner diameter) by 16” long pipe wrapped with bands of white, yellow and red Hi-Intensity prismatic sheeting. One side of the stake has a black band that faces towards the protected area. The Seibert stakes are placed around the perimeter of the protected area. A photograph of a Seibert stake is shown on Figure 3.

Currently, alternating Seibert Stakes (11) and “Unauthorized Personnel” warning signs (9) are placed along the perimeter at approximately 50-foot intervals (Figure 1). The “Unauthorized Personnel” warning signs currently in place read:

**DANGER  
UNAUTHORIZED  
PERSONNEL  
KEEP OUT**

The Seibert Stakes and five of the “Unauthorized Personnel” signs will be kept in place and maintained. Four “Asbestos Waste Disposal Site” warning signs that read as follows will be replace the four removed “Unauthorized Personnel” warning signs:

**DANGER  
ASBESTOS WASTE  
DISPOSAL SITE  
NO DIGGING  
DO NOT CREATE DUST  
BREATHIING ASBESTOS  
IS HAZARDOUS TO YOUR  
HEALTH**

The signs will meet the requirements of Ohio Administrative Code (OAC) 3745-20-07-(B)(1)(b).

### **2.2 Digging Restrictions**

All digging or excavation within the AOC is prohibited due to residual asbestos and COCs in the surface soil. The digging restriction will be managed using permanent signs and Seibert Stakes placed along the AOC perimeter (see Section 2.1). Information about the LUCs at the AOC will be briefed during the annual general LUC awareness training at Camp James A. Garfield. An annual LUC inspection will be conducted to ensure that implemented LUCs remain effective.

### **2.3 Annual LUC Inspection**

An annual LUC inspection will be conducted by the ARNG/OHARNG or other authorized personnel to confirm that the LUCs remain effective and still meet LUC objectives. The annual LUC inspection will also note any change in land use and will inspect the soil cover, signs and Seibert Stakes. If deficiencies are noted, the inspection will recommend corrective actions (required repairs). Any noted LUC violations will be reported to the ARNG/OHARNG and documented in the report. The required annual inspection will be submitted with other annual LUC control inspections conducted for other AOCs at Camp James A. Garfield. The annual inspection will be submitted to the Ohio Environmental Protection Agency (EPA) for review and approval. The Annual LUC Inspection Form for RVAAP-51 Dump Along Paris-Windham Road is presented in Appendix A.

### **2.4 Five-Year Review**

Due to the presence of COCs remaining in surface soil above the cleanup goals for Residential/Unrestricted use and asbestos at the AOC, five-year reviews are required. The five-year review will evaluate the LUCs at the AOC to determine if they remain protective and effective. The five-year review will be submitted to the Ohio EPA for review and approval.

## **SECTION 3.0 OPERATIONS AND MAINTENANCE PLAN**

### **3.1 Sign Maintenance**

Signs, poles and Seibert markers will be inspected annually to confirm that they are visible and in good repair. Signs, poles and Seibert markers will be repaired or replaced as appropriate. At least annually, brush, weeds and other vegetative growth will be cleared so that the signs and markers remain visible to personnel approaching the site.

### **3.2 Soil Cover Inspection**

The condition of the soil cover at the AOC will be inspected as part of the annual inspection. Repairs, if required, will utilize clean soil and appropriate equipment. Personnel conducting repairs will be briefed on the LUCs at the AOC.

### **3.3 Notification**

Conditions at the AOC will be inspected and documented on an annual basis. Any LUC deficiencies or violations will be reported to the ARNG/OHARNG. Repairs will be made as necessary in a timely manner. Conditions noted and findings of the inspection will be reported in an annual LUC report.

### **3.4 Schedule of Deliverables**

#### **3.4.1 Initial Installation**

In Spring 2019, the additional “Asbestos Waste Disposal Site” warning signs will replace four “Unauthorized Personnel” warning signs as described in Section 2.1 and shown on Figure 3.

#### **3.4.2 Annual Maintenance**

The signs, poles and Seibert markers will be cleared of brush annually so that they remain visible from a distance. The poles, signs and Seibert markers will be inspected at least annually and repaired as needed. The annual maintenance activities will occur in conjunction with the Annual LUC inspection.

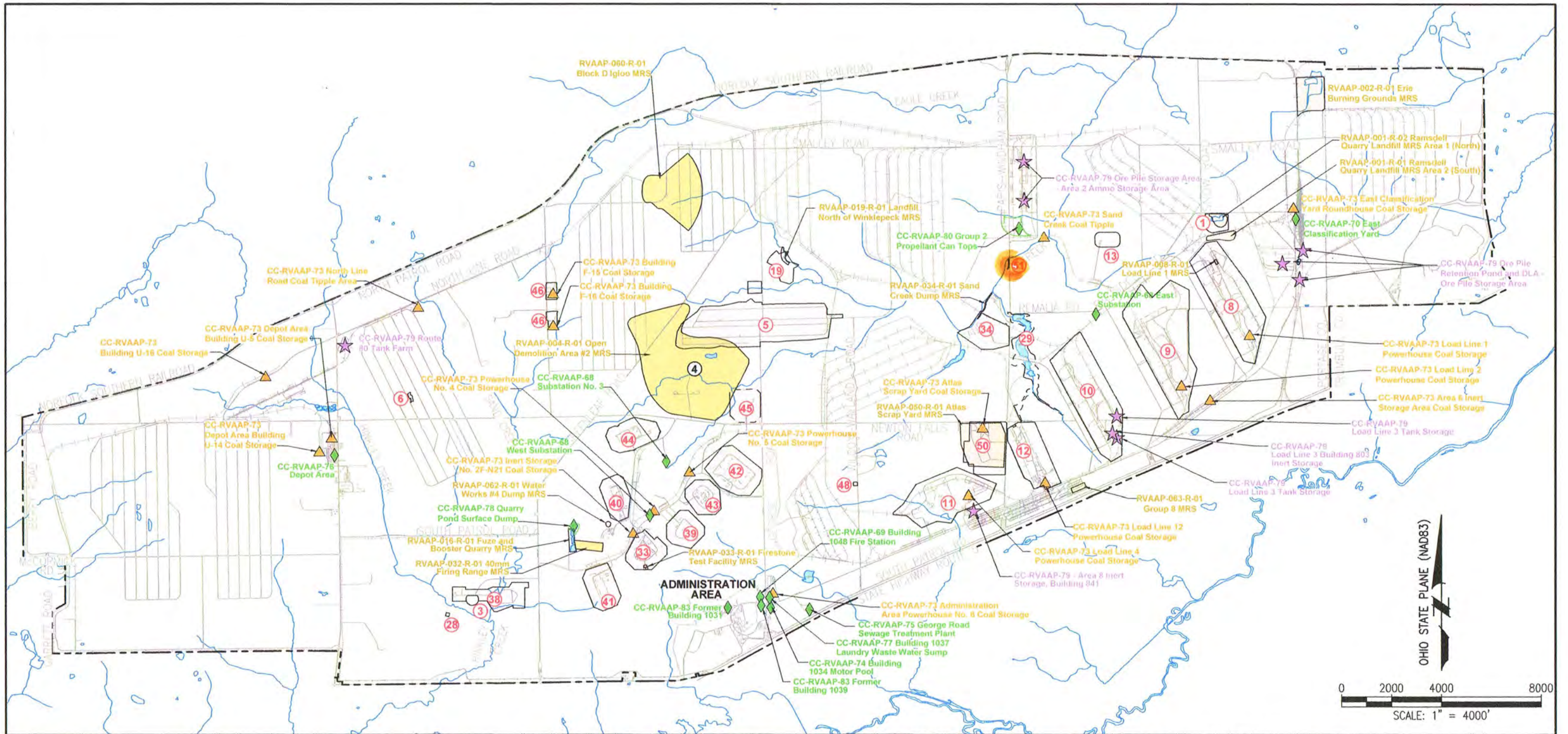
#### **3.4.3 Annual Inspection**

The annual LUC inspection will be conducted in the Fall of each year as per Sections 3.1 and 3.2. The annual LUC report will be submitted to the Ohio EPA in the late winter/early Spring for review and approval. The annual LUC report for RVAAP-51 Dump Along Paris-Windham Road will be submitted in a single document along with other annual LUC reports for Camp James A. Garfield/former RVAAP.

## **FIGURES**

- Figure 1      Location of AOCs at RVAAP/Camp Ravenna/Camp James A. Garfield
- Figure 2      Limited RD/RA Excavated and Sampled Areas Location Map
- Figure 3      “As Installed” Seibert Markers and Signs and Proposed Asbestos Warning Sign Locations





IRP SITES - CERCLA		COMPLIANCE RESTORATION SITES (13 SITES)		MMRP SITES (14 SITES)		OTHER REGULATORY - RCRA	
1	RVAAP-01..... RAMSDELL QUARRY LANDFILL	38	RVAAP-38..... NACA TEST AREA	RVAAP-001-R-02.....	RAMSDELL QUARRY LANDFILL AREA 1 (NORTH)	4	RVAAP-04..... OPEN DEMOLITION AREA #2
3	RVAAP-03..... OPEN DEMOLITION AREA #1	39	RVAAP-39..... LOAD LINE 5	RVAAP-001-R-01.....	RAMSDELL QUARRY LANDFILL AREA 2 (SOUTH)		<b>LEGEND:</b>
5	RVAAP-05..... WINKLEPECK BURNING GROUNDS	40	RVAAP-40..... LOAD LINE 7	RVAAP-002-R-01.....	ERIE BURNING GROUNDS MRS	◆	COMPLIANCE RESTORATION SITES - APPROVED
6	RVAAP-06..... C BLOCK QUARRY	41	RVAAP-41..... LOAD LINE 8	RVAAP-004-R-01.....	OPEN DEMOLITION AREA #2 MRS	★	DLA ORE STORAGE AREAS (7 SITES)
8	RVAAP-08..... LOAD LINE 1	42	RVAAP-42..... LOAD LINE 9	RVAAP-008-R-01.....	LOAD LINE 1 MRS	▲	COAL STORAGE AREAS (17 SITES)
9	RVAAP-09..... LOAD LINE 2	43	RVAAP-43..... LOAD LINE 10	RVAAP-016-R-01.....	FUZE AND BOOSTER QUARRY MRS	□	AOC SITES
10	RVAAP-10..... LOAD LINE 3	44	RVAAP-44..... LOAD LINE 11	RVAAP-019-R-01.....	LANDFILL NORTH OF WINKLEPECK MRS	+	MMRP SITES
11	RVAAP-11..... LOAD LINE 4	45	RVAAP-45..... WET STORAGE AREA	RVAAP-032-R-01.....	40MM FIRING RANGE MRS	—+—+—+—	RAILROAD TRACKS
12	RVAAP-12..... LOAD LINE 12	46	RVAAP-46..... BUILDINGS F-15 AND F-16	RVAAP-033-R-01.....	FIRESTONE TEST FACILITY MRS	—	FENCELINE
13	RVAAP-13..... BLDG 1200 & DILUTION/SETTLING POND	48	RVAAP-48..... ANCHOR TEST AREA	RVAAP-034-R-01.....	SAND CREEK DUMP MRS	~	STREAM OR CREEK
19	RVAAP-19..... LANDFILL NORTH OF WINKLEPECK BURNING GROUNDS	50	RVAAP-50..... ATLAS SCRAP YARD	RVAAP-050-R-01.....	ATLAS SCRAP YARD MRS		
28	RVAAP-28..... MUSTARD AGENT BURIAL SITE	51	RVAAP-51..... DUMP ALONG PARIS-WINDHAM ROAD	RVAAP-060-R-01.....	BLOCK D IGLOO MRS		
29	RVAAP-29..... UPPER AND LOWER COBBS PONDS	52	RVAAP-52..... FACILITY-WIDE GROUNDWATER	RVAAP-061-R-01.....	BLOCK D IGLOO - TD MRS		
33	RVAAP-33..... LOAD LINE 6	53	RVAAP-53..... FACILITY-WIDE SEWERS	RVAAP-062-R-01.....	WATER WORKS #4 DUMP MRS		
34	RVAAP-34..... SAND CREEK DISPOSAL ROAD LANDFILL			RVAAP-063-R-01.....	GROUP 8 MRS		

Figure 1 - Location of AOCs at RVAAP/Camp Ravenna.

**FORMER RVAAP/CAMP RAVENNA  
PORTAGE & TRUMBULL COUNTIES, OHIO**

DRAWN BY:  
P. HOLM

REV. NO./DATE:  
REV.2/02-05-16

CAD FILE:  
08042/DWGS/Q94-RVAAP-AOCs



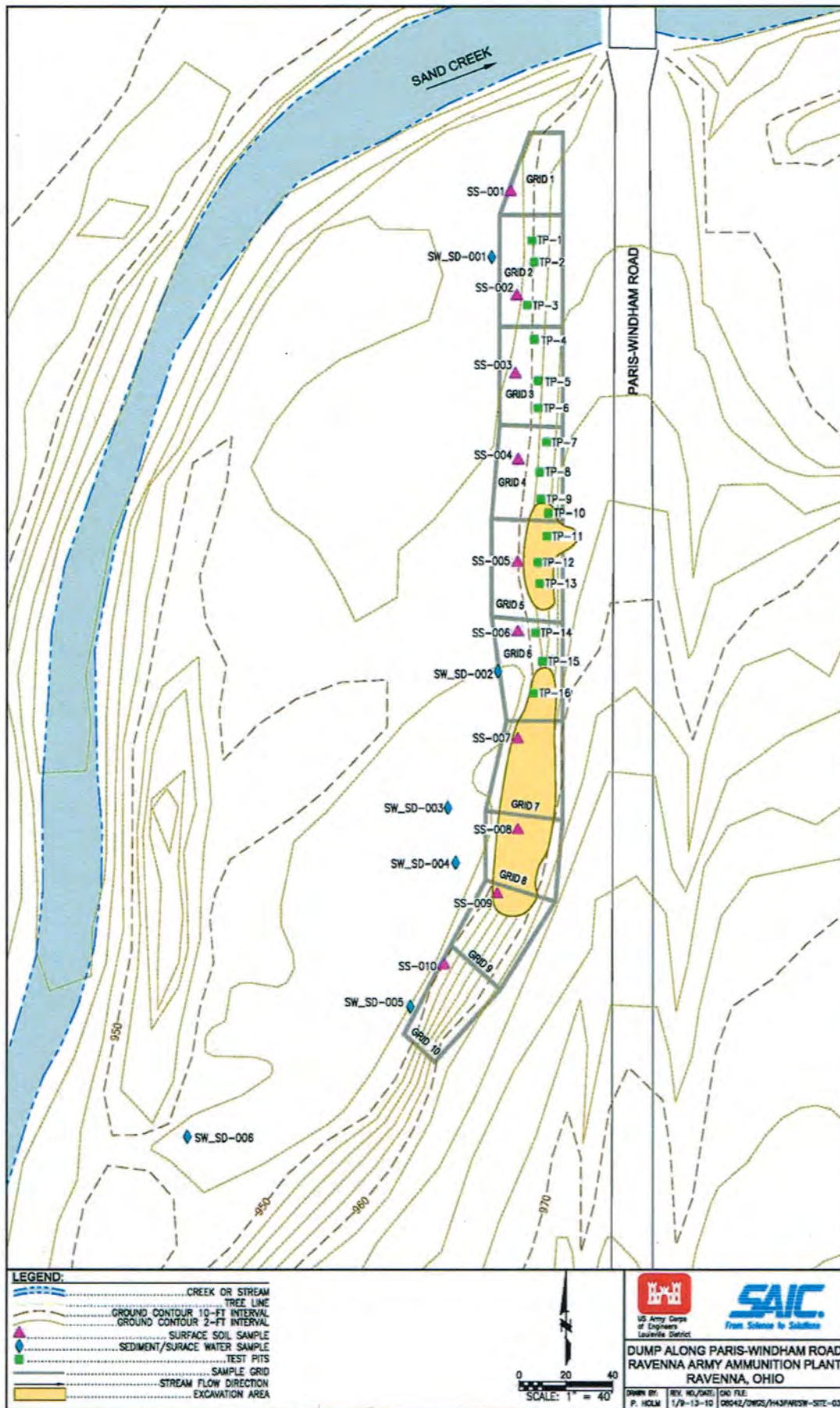
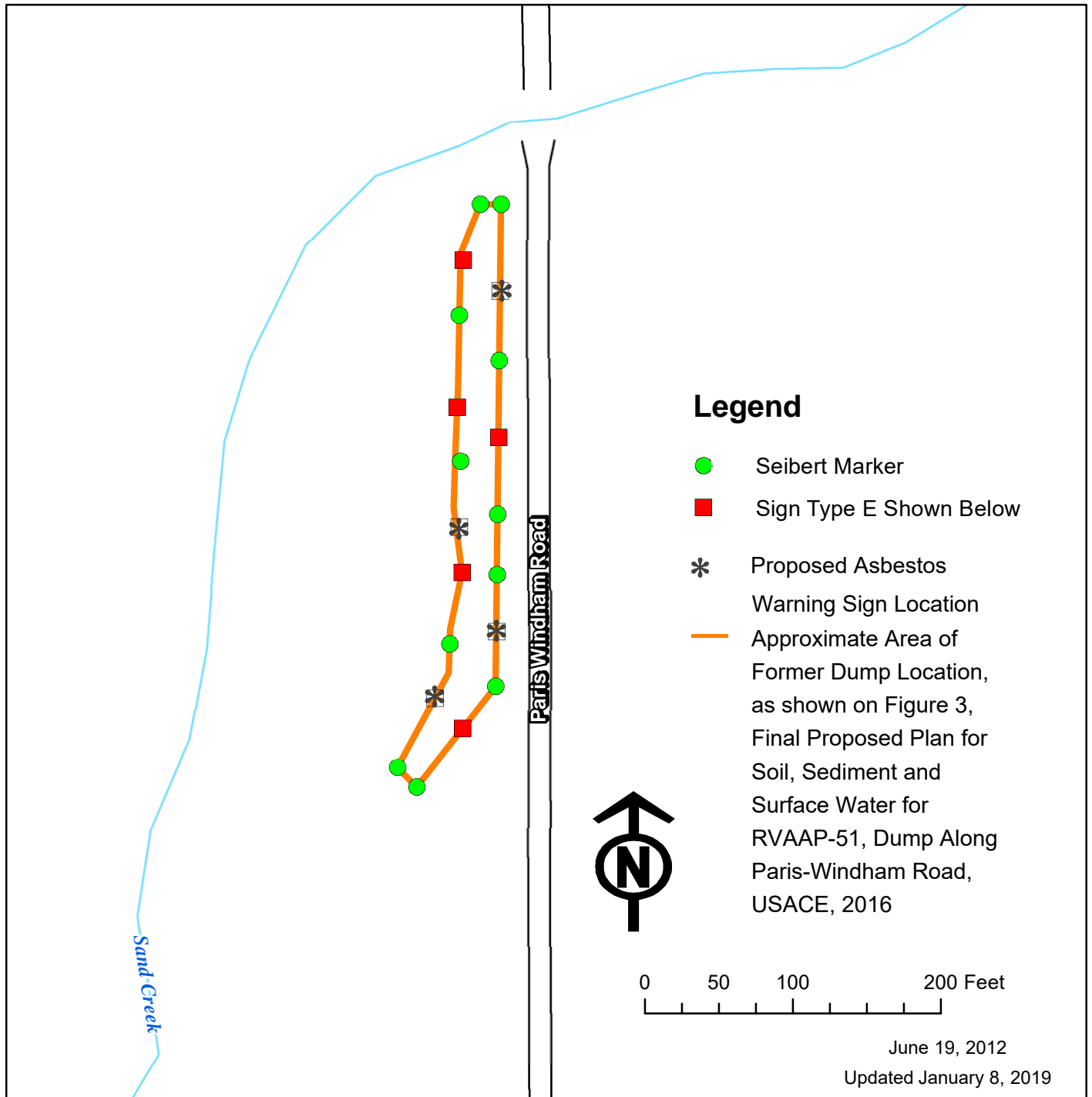


Figure 2 - Limited RD/RA Excavated and Sampled Areas Location Map



**Figure 3 - "As-Installed" Seibert Markers, Signs and Proposed Asbestos Warning Sign Locations**

(10"x14")

Black stripe faces AOC



**RVAAP-51 Dump Along Paris-Windham Road,  
Former Ravenna Army Ammunition Plant, Ravenna, Ohio**



## **APPENDIX A**

### **RVAAP-51 Dump Along Paris-Windham Road Land Use Control Inspection Form**

**Camp James A. Garfield Joint Military Training Center/Former Ravenna Army Ammunition Plant  
(RVAAP)**

**RVAAP-51 Dump Along Paris Windham Road – Inspection Form**

In accordance with the Camp Ravenna/former RVAAP Property Management Plan (PMP), an inspection of RVAAP-51 Dump Along Paris Windham Road was conducted by \_\_\_\_\_ on \_\_\_\_\_.

The annual inspection required by the PMP includes the following:

- Review of LUC training and documentation as applicable to the Dump Along Paris Windham Road.
- Evaluation of activities at the AOC to ensure that residential use and digging is not occurring.
- Inspection of Seibert Stakes and signage.
- Inspection of the soil cover.

LUC deficiencies or inconsistent land uses that are identified must be reported and identified on the inspection form and properly reported to the Army National Guard (ARNG)/Ohio Army National Guard (OHARNG).

---

**Review of LUCs – Management/Effectiveness/Corrective Action**

**1. Activities and Land Use**

- a.) This AOC is restricted from residential land use. Has residential use occurred?
- b.) Digging is prohibited at the AOC. Has digging occurred at the AOC?
- c.) Warning signs and Seibert Stakes are required at the AOC along the boundary. Are Seibert Stakes and signage present, functional and in good condition? Are they visible (free of vegetation)?
- d.) The soil cover installed after the 2003 soil removal action creates a barrier between the receptor and the residual PAHs and asbestos in the soil. Is the soil cover intact? Is any damage or erosion on the soil cover present?

**2. Inspections and Reporting**

a.) Inspections are required on an annual basis. Are annual inspections being completed?

b.) An annual report is required. Has the annual report been completed and submitted?

**3. Training (as applicable to WBG)**

a.) Was LUC training (specific to the AOC) being conducted as applicable? Describe the training (content/who attended/who provided/documentation of training).

b.) If training was not provided, explain why and what corrective actions were initiated?

---

**4. Description of any observed/noted LUC violation(s):**

**5. Date of Notification of LUC violation (if applicable):**

**6. Description of any corrective actions taken to remedy observed LUC violation(s) or recommended corrective actions:**

**7. Additional Notes/Comments:**

---

**Original Inspection Completed by:**

Signature:

Printed Name:

Title:

Organization:

Date: