

APPENDIX I

Regulatory Correspondence and Comment Response Table

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April 16, 2015

Mr. Mark Leeper, P.G., MBA
Army National Guard Directorate
Environmental Programs Division
ARNG-ILE-CR
111 South George Mason Drive
Arlington, VA 22204

**Re: US Army Ravenna Ammunition Plt RVAAP
Assessment
Remedial Response
Portage County
267000859155**

**Subject: Ohio EPA's Review of Draft Site Inspection Report, CC-RVAAP-83
Former Buildings 1031 and 1039 Project No. 267-000859-155; Notice
of Deficiency**

Dear Mr. Leeper:

The Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO) has reviewed the Draft Site Inspection Report for CC-RVAAP-83 Former Buildings 1031 and 1039, dated February 27, 2015. The document was prepared by ECC, under contract no. W912QR-04-D-0039.

Ohio EPA has identified the following deficiencies in the report. Ohio EPA will review either a response to comments letter or Response to Comments (RTC) table. However, a revised report will need to be completed prior to final approval of the document.

Comments:

1. Remove the disclaimer statement at the beginning of the document. This comment has been noted in Ohio EPA's review of previous ECC reports. Please refrain from including it in the future.
2. **Table 5.2:** This table lists Resident Child Farmer and Resident Adult Farmer. Per the February 4, 2014 Final Technical Memorandum, Land uses and Revised Risk Assessment Process for RVAAP Installation Restoration Program, these Facility-wide Cleanup Goals (FWCUGs) have been replaced by: Unrestricted (Residential) Land Use – Resident Receptor (Adult and Child). Please revise the table accordingly.
3. **Section 5.2.1:** The site history, as described in Section 2.2 of the report, does not discuss any historical uses that would result in MTBE being a potential COC.

MR. MARK LEEPER, P.G., MBA
ARMY NATIONAL GUARD DIRECTORATE
APRIL 16, 2015
PAGE 2

Please explain the rationale for sampling for MTBE and revise the site history to account for MTBE being a potential COC. U.S. EPA's web page about the history of MTBE use in fuels may be helpful: <http://www.epa.gov/mtbe/faq.htm>

If you have any questions or concerns related to this review or would like to schedule a meeting or conference call, please free feel to contact me at (330) 963-1170.

Sincerely,

Edward D'Amato
Project Coordinator
Ohio EPA - Division of Environmental Response and Revitalization

ec: Rod Beals, DERR-NEDO, Manager
Justin Burke, DERR-CO
Katie Tait, OHARNG RTLS
Kevin Sedlak, ARNG
Gregory F. Moore, USACE
Mark Nichter, USACE
Rebecca Haney/Gail Harris, Vista Sciences Corp.
Ohio EPA, VAP File, CO, DERR at: records@epa.ohio.gov



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

May 19, 2015

Ohio Environmental Protection Agency
DERR-NEDO
Attn: Ed D'Amato
2110 East Aurora Road
Twinsburg, OH 44087-1924

Subject: Former Ravenna Army Ammunition Plant (RVAAP) Restoration Program
Portage/Trumbull Counties, CC RVAAP-83 Former Buildings 1031 and 1039,
Draft Site Inspection Report, Ohio EPA ID # 267-000-859-155

Dear Mr. D'Amato:

Enclosed for your review are the responses to the Ohio EPA comments on the *Draft Site Inspection Report* in support of the Environmental Remediation Services (ERS) project at the former Buildings 1031 and 1039 Area of Concern (CC RVAAP-83) at the former Ravenna Army Ammunition Plant (RVAAP).

The Army requests Ohio EPA review these comment responses. Upon approval of these responses, the Army will proceed with the formulation of the Final Site Inspection Report for CC-RVAAP-83.

Please contact the undersigned at (703) 607-7955 or mark.s.jeeper.civ@mail.mil if there are issues or concerns with this submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Leeper", is positioned below the "Sincerely," text.

Mark Leeper
RVAAP Restoration Program Manager
Army National Guard Directorate

Attachment

cc: Justin Burke, Ohio EPA, DERR-CO
Rod Beals, Ohio EPA, DERR-NEDO
Katie Tait, OHARNG Camp Ravenna
Kevin Sedlak, ARNG, Camp Ravenna
Greg Moore, USACE Louisville
Nat Peters, USACE Louisville
Eric Cheng, USACE Louisville
Gail Harris, Vista Sciences

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DRAFT SITE INSPECTION REPORT, REVISION 1
CC RVAAP-83 FORMER BUILDINGS 1031 AND 1039
FORMER RAVENNA ARMY AMMUNITION PLANT, PORTAGE AND TRUMBULL COUNTIES, OHIO
COMMENT RESPONSE TABLE

Site Inspection Report Submitted – 27 February 2015

Ohio EPA Comments Received – 17 April 2015

Response to Comments Issued – 19 May 2015

Page 1 of 3

Comment Number	Page No. / Line No.	New Page or Sheet	Comment	Recommendation	Response
<i>Ohio EPA (Ed D'Amato)</i>					
1	General		Remove the disclaimer statement at the beginning of the document. This comment has been noted in Ohio EPA's review of previous ECC reports. Please refrain from including it in the future.		The Disclaimer Statement will be removed from the document when the final version is issued. The Disclaimer Statement in Draft reports is included per the Submission Format Guidelines Ravenna Army Ammunition Plant (dated July 22, 2014). The Disclaimer Statement is removed from Final report version. If ECC did not included the Disclaimer Statement in the Draft report version, the ACOE's Administrative Record Document Reviewer, would deem the report non-compliant with the current Ravenna Submission Format Guidelines.
2	Table 5-2		This table lists Resident Child Farmer and Resident Adult Farmer. Per the February 4, 2014 Final Technical Memorandum, Land uses and Revised Risk Assessment Process for RVAAP Installation Restoration Program, these Facility-wide Cleanup Goals (FWCUGs) have		The tables in Section 5 (Tables 5-2 and 5-3) will be revised to remove the word "Farmer" from the terms <i>Resident Child Farmer</i> and <i>Resident Adult Farmer</i> . The column headings in Tables 5-2 and 5-3 will be revised as

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Page 2 of 3

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			been replaced by: Unrestricted (Residential) Land Use – Resident Receptor (Adult and Child). Please revise the table accordingly.		follows: “ <i>Resident Child Farmer</i> ” and “ <i>Resident Adult Farmer</i> ”.
3	Section 5.2.1		<p>The site history, as described in Section 2.2 of the report, does not discuss any historical uses that would result in MTBE being a potential COC. Please explain the rationale for sampling for MTBE and revise the site history to account for MTBE being a potential COC. U.S. EPA’s web page about the history of MTBE use in fuels may be helpful: http://www.epa.gov/mtbe/faq.htm</p>		<p>We agree that the history of this site does not indicate usage of products that would contain or suspected to contain MTBE, as MTBE was primarily fuel a fuel additive to gasoline.</p> <p>Former Building 1039 was utilized as a laboratory and photo laboratory. MTBE was not identified as being used at Former Building 1039 in the HRR, and MTBE was not identified as as a compound of interest at CC RVAAP-83.</p> <p>MTBE was reported by our contract laboratory (CT Laboratories), since MTBE was on the VOC list that was typically reported for analysis of VOC samples.</p>

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Page 3 of 3

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					<p>The subsurface soil ISM samples from DU01 were analyzed for VOCs and MTBE was included and reported as part of the labs standard VOC reporting list. This is footnoted in Table 4-3. No VOCs (including MTBE compounds) were detected in any of the subsurface soil ISM samples. Lines 1680 to 1682 will be revised as follows for clarification of this comment:</p> <p><i>“A vertical subsurface soil ISM QA sample from SB03 was collected at the 4- to 10-ft bgs interval and analyzed for VOCs, (including methyl tert-butyl ether [MTBE]), SVOCs, TAL metals, propellants, and explosives. MTBE is not related to the former usage of the AOC but was included in the standard VOC analyte list.”</i></p>
<i>End of Comments</i>					

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Catherine Guido

From: Catherine Guido
Sent: Wednesday, June 10, 2015 10:38 AM
To: Catherine Guido
Subject: FW: Correspondence Dated 19 May 2015 - Response To Comments or Draft Site Inspection Report, CC RVAAP-83, Former Buildings 1031 and 1039
Attachments: FW: Ravenna - PBA11 CR Sites - CC-83 letter of transmittal (UNCLASSIFIED)

From: D'Amato, Ed [<mailto:Ed.Damato@epa.ohio.gov>]
Sent: Thursday, June 04, 2015 2:31 PM
To: Allan Brillinger
Cc: Burke, Justin; Beals, Rodney; Katie Tait; Kevin Sedlak; Gregory Moore; Nathaniel Peters II; Eric Cheng; gail.harris@vistasciences.com; Rebecca Shreffler Haney; Pam Foti; Leeper, Mark S CIV (US); Robert I> Guthrie; Princic, Bob; Tucker, Brian
Subject: RE: Correspondence Dated 19 May 2015 - Response To Comments or Draft Site Inspection Report, CC RVAAP-83, Former Buildings 1031 and 1039

Mr. Brillinger:

I have reviewed the response and find it acceptable (Ohio EPA's formal receipt date for the response is May 21, 2015 since that's when the postal letter was received). Please revise the document accordingly and re-submit it. Upon receipt I can send a formal letter approving the document.

Regards,

Ed D'Amato

Division of Environmental Response and Revitalization
Ohio EPA
Northeast District Office
2110 E. Aurora Rd
Twinsburg, OH 44087
Direct: (330) 963-1170
Fax: (330) 487-0769
ed.damato@epa.ohio.gov

From: Allan Brillinger [<mailto:allan.brillinger@vistasciences.com>]
Sent: Tuesday, May 19, 2015 4:34 PM
To: D'Amato, Ed
Cc: Burke, Justin; Beals, Rodney; Katie Tait; Kevin Sedlak; Gregory Moore; Nathaniel Peters II; Eric Cheng; gail.harris@vistasciences.com; Rebecca Shreffler Haney; 'Pam Foti'; Leeper, Mark S CIV (US); Robert I> Guthrie; Tucker, Brian
Subject: Correspondence Dated 19 May 2015 - Response To Comments or Draft Site Inspection Report, CC RVAAP-83, Former Buildings 1031 and 1039

Dear Mr. D'Amato,
Please see attached correspondence dated 19 May 2015 regarding Response to Comments for the Draft Site Inspection Report for CC RVAAP-83, Former Buildings 1031 and 1039.

If you have any questions please contact Mark Leeper at 703-601-7785 or mark.s.leeper.civ@mail.mil.

Regards,

Al Brillinger
Program Manager
Camp Ravenna
Vista Sciences Corporation
1438 State Route 534 SW
Newton Falls, Ohio 44444
330-872-8009 (office)
330-980-1289 (cell)