
FINAL WETLANDS MITIGATION AND RESTORATION PLAN

REMEDIAL ACTION AT RVAAP-50 – ATLAS SCRAP YARD FORMER RAVENNA ARMY AMMUNITION PLANT RESTORATION PROGRAM

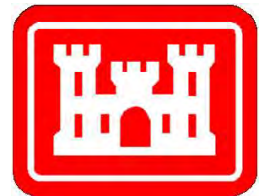
CAMP JAMES A. GARFIELD
PORTAGE AND TRUMBULL COUNTIES, OHIO

January 2025

Contract No.: W912QR19D0056
Delivery Order No.: W912QR23F0015

Prepared for:

U.S. ARMY CORPS OF ENGINEERS, LOUISVILLE DISTRICT
P.O. Box 59
Louisville, KY 40201-0059



Prepared by

Davey Resource Group
333 Martinel Drive
Kent, OH 44240

for

PIKA-Insight JV, LLC
12723 Capricorn Drive | Suite 500
Stafford, TX 77477

PLACEHOLDER PAGE FOR:

Documentation of Ohio EPA Concurrence of Final Document

(Documentation to be provided once concurrence is issued)

CONTRACTOR STATEMENT OF INDEPENDENT TECHNICAL REVIEW

PIKA-Insight JV, has completed the preparation of this Final Mitigation and Restoration Plan as part of the Remedial Action at RVAAP-50 – Atlas Scrap Yard at the Former Ravenna Army Ammunition Plant (RVAAP)/Camp James A. Garfield. 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 independent technical review included evaluation of data quality objectives; technical assumptions; methods, procedures, and material to be used in analyses; the appropriateness of data used and level of data obtained; and reasonableness of the results, including whether the product meets the customer's needs consistent with law and existing USACE policy.



Marco Mendoza
Project Manager

01/17/25

Date



Signature
Independent Technical Reviewer

01/17/25

Date

FINAL WETLANDS MITIGATION AND RESTORATION PLAN
REMEDIAL ACTION AT RVAAP-50 – ATLAS SCRAP YARD
FORMER RAVENNA ARMY AMMUNITION PLANT RESTORATION PROGRAM
CAMP JAMES A. GARFIELD
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PREPARED UNDER THE SUPERVISION OF
& APPROVED FOR SUBMITTAL BY:



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ARNG	Army National Guard
DERR	Division of Environmental Response and Revitalization
NEDO	Northeast District Office
OHARNG	Ohio Army National Guard
OH EPA	Ohio Environmental Protection Agency
SWDO	Southwest District Office
USACE	United States Army Corps of Engineers

This Final Wetlands Mitigation and Restoration Plan has been prepared by the Davey Resource Group (DRG) for PIKA-Insight Joint Venture, LLC (PIKA-Insight) on behalf of the U.S. Army Corps of Engineers (USACE) for the remedial action at RVAAP-50 Atlas Scrap Yard at Camp James A Garfield, Portage and Trumbull Counties, Ohio. The work proposed in the plan is in accordance with the Performance Work Statement, Modification 0001, Task 4, dated January 2, 2024.

Attachments

Attachment 1 Final Wetlands and Restoration Plan RVAAP-50 Atlas Scrap Yard

ATTACHMENT 1

**FINAL WETLANDS AND RESTORATION PLAN
RVAAP-50 ATLAS SCRAP YARD**

Mitigation and Restoration Plan

Based on the planned remediation activities, site conditions, and end use goals, Davey Resource Group, Inc. (DRG) has compiled the following wetland mitigation and restoration plan for the Former Storage Area (FSA) and Former Incineration Area (FIA) at Camp James A. Garfield (CJAG) in Portage and Trumbull Counties, Ohio.

Background

The Atlas Scrap Yard Area of Concern (AOC) is a 73-acre site that was formerly used as a construction camp to house workers and their families during the construction of the former Ravenna Army Ammunition Plant (RVAAP). It was also used to stockpile a variety of salvaged materials including railroad ties, brick, and concrete. Due to its history and past use, soil contamination exists at two locations within the AOC which requires remedial action. A wetlands delineation was completed in 2018. Approximately 473 cubic yards of polycyclic aromatic hydrocarbons (PAH) contaminated surface soil requires removal in a ditch line in the central portion of the AOC which will impact approximately 0.05 acres of a Category 1 or 2 gray zone forested wetland. Approximately 366 cubic yards of surface soil require removal in a FIA to remove lead-contaminated soil at the AOC which will impact approximately 0.16 acres of a Category 3 wetland.

An initial meeting with the Ohio EPA and USACE was conducted in April 2023 to discuss wetlands mitigation and restoration requirements. During the meeting, it was determined that a 3:1 mitigation ratio for the approximate 0.3 acres of impacted wetland (rounded from 0.21 to 0.3 acres) through purchase of wetland credits at a mitigation bank or in-lieu fee program would be appropriate for this project. To provide a contingency in case there is more contaminated soil needing removal than what is currently anticipated, the Ohio EPA suggested that a buffer be reserved. An estimate of 0.5 acres of total impacts was agreed upon. Therefore, using a 3:1 ratio, 1.5 acres of Category 3 wetland credits will be reserved. All mitigation and restoration information proposed in the following document is what was agreed upon at the April 2023 meeting. The only proposed change is to the quantity of the areas being restored, which exceeds the amount previously discussed. However, for the success of the overall restoration, it was determined that the entire disturbed area will be restored.

Section 1: Wetland Mitigation

Two wetlands will be impacted as a result of the remediation activities. Wetland A, located south of Newton Falls Road (FSA site), is a Category 1 or 2 gray zone, non-isolated, forested wetland (Attachment 1-A). Wetland B located west of Paris Windham Road (FIA site) is a Category 3, non-isolated, forested wetland (Attachment 1-A). To fulfill the mitigation requirements for this site, the above guidance from the EPA and USACE is being used; therefore, a total of 1.5 acres of mitigation credits are proposed to be purchased using a 3:1 mitigation ratio for both wetlands.

Following the hierarchy preference as listed in 33 CFR 332.3(b), all mitigation banks within the watershed were identified to determine if wetland mitigation bank credits were available. Off-site wetland mitigation is proposed through the Stream & Wetlands (S&W) Willow Creek Wetland Mitigation Bank within the Mahoning-Shenango Watershed (HUC 05030103). No other banks within the Mahoning-Shenango watershed currently have credits available. See Attachment 2 for the signed credit reservation contract. See Attachment 3 for the memorandum to document for the final wetland impact and mitigation calculation.

The Willow Creek Mitigation Bank was designed to meet the objective: “To generate wetland and stream mitigation credits to replace lost aquatic resource function associated with Clean Water Act Section 404 permits. The Willow Creek Bank will generate credits through wetland re-establishment, wetland rehabilitation, and upland forest re-establishment.” The site received its first release of credits on May 30, 2024, via a formal credit release from USACE, Pittsburg District. The site also has forested wetland credits available for purchase which are in-kind with impacts in accordance with 3745-1-54(E)(3).

Section 2: Wetland Restoration

Although the proposed off-site wetland mitigation will officially address the wetlands impacted due to the remediation activities, CJAG has also opted to restore the wetland areas. As part of the restoration of the remediated area, the wetlands will be restored to their pre-construction condition and will include invasive vegetation control and a 1-year post-restoration assessment. These restored areas will not be considered permanent onsite mitigation and will not be monitored and/or subject to restrictions common with mitigation sites.

Former Storage Area (FSA), 0.05 Acre

This site is an open field leading to a small 0.05-acre wetland area on the south end of the remediation area (Attachment 1-B). The FSA site totals 0.41 acre of disturbed area. Following soil remediation activities, DRG recommends installing a native seed mix and native trees and shrubs within the disturbed area to provide vegetative cover and restore the wetland area. Upon completion of all earthwork and verification that the soils and topography are appropriate for wetland vegetation installation and development, DRG recommends installing a total of 50, 3-gallon trees and shrubs within all disturbed wetland and non-wetland areas. Some woody vegetation will help reduce the establishment of non-native, invasive vegetation in this area. DRG recommends the following plant species and quantities for the FSA site.

Table 1: Tree and Shrub Species Selection and Quantities for FSA Site

Scientific Name	Common Name	Quantity
<i>Carya laciniosa</i>	shellbark hickory	5
<i>Quercus bicolor</i>	swamp white oak	10
<i>Quercus palustris</i>	pin oak	15
<i>Amelanchier laevis</i>	Allegheny serviceberry	5
<i>Cornus sericea</i>	red osier dogwood	5
<i>Physocarpus opulifolius</i>	ninebark	5
<i>Salix sericea</i>	silky willow	5
Total		50

In addition to the trees and shrubs, DRG recommends installing the native seed mix in Table 2 within the disturbed area. This will provide long-term site stabilization, and some understory cover in the forested area.

Table 2: Native Wetland Seed Mix for FSA Site

Species Name	Common Name	%
<i>Elymus virginicus</i>	Virginia Wild Rye	27.44%
<i>Andropogon gerardii</i>	Big Bluestem	23.00%
<i>Elymus canadensis</i>	Nodding Wild Rye	17.19%
<i>Rudbeckia hirta</i>	Black-eyed Susan	4.69%
<i>Desmodium canadense</i>	Showy Tick Trefoil	3.75%
<i>Elymus riparius</i>	Riverbank Wild Rye	3.75%
<i>Carex shortiana</i>	Short's sedge	3.12%
<i>Monarda fistulosa</i>	Wild Bergamot	1.87%
<i>Verbena hastata</i>	Blue Vervain	1.56%
<i>Carex vulpinoidea</i>	Brown Fox Sedge	1.56%
<i>Asclepias incarnata</i>	Rose Milkweed	1.56%
<i>Carex crinita</i>	Fringed Sedge	1.56%
<i>Panicum clandestine</i>	Deer-tongue Grass	1.25%
<i>Asclepias syriaca</i>	Common Milkweed	0.94%
<i>Silphium perfoliatum</i>	Cup Plant	0.62%
<i>Senna hebecarpa</i>	Wild Senna	0.62%
<i>Tradescantia ohioensis</i>	Ohio Spiderwort	0.62%
<i>Actinomeris alternifolia</i>	Wingstem	0.62%
<i>Juncus effusus</i>	Common Rush	0.62%
<i>Physostegia virginiana</i>	Obedient Plant-Purple	0.62%
<i>Vernonia gigantea</i>	Tall Ironweed	0.62%
<i>Agrostis perennans</i>	Autumn Bentgrass	0.44%
<i>Scirpus cyperinus</i>	Woolgrass	0.31%
<i>Ratibida pinnata</i>	Grey-Headed Coneflower	0.25%
<i>Pycnanthemum tenuifolium</i>	Narrow Leaved Mountain Mint	0.19%
<i>Eupatorium maculatum</i>	Spotted Joe Pye	0.19%
<i>Solidago nemoralis</i>	Dwarf Goldenrod	0.12%
<i>Juncus tenuis</i>	Path Rush	0.12%
<i>Solidago rigida</i>	Stiff Goldenrod	0.06%
<i>Aster novae-angliae</i>	New England Aster	0.06%

Former Incineration Area (FIA), 0.16 Acre

This area was formerly forested and subsequently cleared and grubbed to allow for remediation activities. The total disturbed area of the FIA is 0.39 acre (Attachment 1-C). To restore this site to its former habitat type, DRG recommends installing a native wetland seed mix and native trees and shrubs within the disturbed wetland, as well as in the cleared non-wetland areas. Upon completion of all earthwork and verification that the soils and topography are appropriate for wetland vegetation installation and development, DRG recommends installing a total of 175, 3-gallon trees and shrubs. This will result in approximately 10' x 10' initial spacing, account for roughly 20-30% mortality over the period of establishment to maturity, and result in approximately 15-foot spacing at maturity. This will restore the area to a forested wetland habitat, as it was prior to remediation. DRG recommends the following plant species and quantities for the FIA site.

Table 3: Tree Species Selection and Quantities for FIA Site

Scientific Name	Common Name	Quantity
<i>Carya laciniosa</i>	shellbark hickory	20
<i>Plantanus occidentalis</i>	American sycamore	20
<i>Quercus bicolor</i>	swamp white oak	25
<i>Quercus palustris</i>	pin oak	25
<i>Salix nigra</i>	black willow	20
<i>Amelanchier laevis</i>	Allegheny serviceberry	15
<i>Cephalanthus occidentalis</i>	buttonbush	5
<i>Cornus sericea</i>	red osier dogwood	15
<i>Physocarpus opulifolius</i>	ninebark	15
<i>Salix sericea</i>	silky willow	15
Total		175

In addition to the trees and shrubs, DRG recommends installing a native shaded wetland seed mix within the disturbed wetland area. This will provide initial site stabilization and provide understory vegetation once the trees and shrubs reach maturity.

Table 4: Native Wetland Seed Mix for FIA Site

Species Name	Common Name	%
<i>Elymus virginicus</i>	Virginia Wild Rye	44.44%
<i>Carex vulpinoidea</i>	Brown Fox Sedge	25.00%
<i>Heliopsis helianthoides</i>	Ox Eye Sunflower	4.44%
<i>Verbena hastata</i>	Blue Vervain	3.27%
<i>Carex scoparia</i>	Blunt Broom Sedge	2.78%
<i>Carex lurida</i>	Shallow/Lurid Sedge	2.78%
<i>Carex lupulina</i>	Common Hop Sedge	2.78%
<i>Leersia oryzoides</i>	Rice Cut Grass	2.30%
<i>Helenium autumnale</i>	Sneezeweed	2.22%
<i>Eupatorium perfoliatum</i>	Common Boneset	1.11%
<i>Alisma subcordatum</i>	Water Plantain	1.11%
<i>Lobelia siphilitica</i>	Great Lobelia	1.11%
<i>Scirpus cyperinus</i>	Woolgrass	1.11%
<i>Polygonatum biflorum canaliculatum</i>	Smooth Solomon's Seal	1.11%
<i>Juncus effusus</i>	Common Rush	1.11%
<i>Asclepias incarnata</i>	Rose Milkweed	1.11%
<i>Aster umbellatus</i>	Flat-topped White Aster	1.11%
<i>Physostegia virginiana</i>	Obedient Plant-Purple	0.56%
<i>Ammannia coccinea</i>	Scarlet Toothcup	0.33%
<i>Chelone glabra</i>	Turtlehead	0.22%

All plant and seed materials for both areas should be installed during the appropriate planting window (fall or spring). If earthwork is completed outside of the appropriate planting window, DRG recommends installing temporary seed for stabilization of the site until the native plantings can be installed.

Post-Remediation Invasive Vegetation Management

DRG recommends performing two (2) herbicide applications in 2025 to control the invasive vegetation within the approximately one (1)-acre total area of the FIA and FSA project areas (0.5 acres of disturbed wetlands and 50-foot buffer around the wetlands). Treatments should be made using a foliar application of aquatic-safe herbicide, primarily glyphosate and triclopyr, via backpack spray units. This will allow for selective treatment and limit off-target damage. Treatments should be completed in the appropriate season for the non-native, invasive vegetation being targeted.

One Year Post Work Inspection Report

One year following the restoration of the wetlands within the FSA and FIA sites, DRG will conduct a site visit to inspect the restored wetland areas and provide a letter report documenting the condition of the wetlands, including making recommendations for any potential future maintenance.

Attachment 1

Attachment 1-A Location Map



Attachment 1-B

Former Storage Area



Attachment 1-C

Former Incinerator Area

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WETLANDS DISTURBANCE AREA
RVAAP-50 - ATLAS SCRAP YARD
FORMER INCINERATOR AREA
CAMP JAMES A. GARFIELD
PORTAGE AND TRUMBULL COUNTIES, OHIO

DRAWN BY: K. MOORE 03/20/23
CHECKED BY: G. HEALY 03/20/23
APPROVED BY:

CONTRACT NUMBER: 112G00943

FIGURE NUMBER

5-2

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Attachment 2

**WETLAND MITIGATION PURCHASE AGREEMENT
MAHONING-SHENANGO UMBRELLA MITIGATION BANK INSTRUMENT
WILLOW CREEK WETLAND MITIGATION BANK**

WHEREAS, entities proposing to place dredged or fill material into waters of the United States or waters of the State of Ohio, including wetlands, must comply with standards and conditions imposed by the Army Corps of Engineers (the "Corps") and/or the Ohio Environmental Protection Agency (the "Ohio EPA") pursuant to Section 404 of the Clean Water Act, 33 U.S.C. § 1344, and/or Ohio Revised Code Chapter 6111 including, in many cases, the mitigation of wetland impacts; and

WHEREAS, the Stream + Wetlands Foundation ("S+W") has participated in the Interagency Review Team ("IRT") review process and received approval from the IRT (which includes the Corps and Ohio EPA) to establish the Willow Creek Wetlands Mitigation Bank ("Willow Creek") as part of the Mahoning-Shenango Umbrella Mitigation Bank Instrument and to sell wetland mitigation credits to entities required to mitigate for impacts to wetlands pursuant to the Section 404/401 permit process and Ohio's Isolated Wetland Permit process; and

WHEREAS, the Corps and the Ohio EPA have agreed to consider the purchase of wetland mitigation credits in an appropriate service area approved by the IRT to fulfill an entity's requirement to mitigate wetland impacts.

THEREFORE, Ohio Army National Guard ("Client") and S+W agree they will comply with the following guidelines and procedures by which Client will purchase wetland mitigation credits from S+W, representing the restoration of wetlands in the State of Ohio which will be permanently maintained and which will serve to mitigate wetland impacts under Sections 404 and 401 of the Clean Water Act and in accordance with ORC Chapter 6111.

I. RESERVATION OF CREDITS AND PAYMENT TERMS FOR THE CLIENT

A. Pursuant to the requirements of Sections 401 and 404 of the Clean Water Act and the regulations promulgated thereunder and/or ORC Chapter 6111, Client is obligated to mitigate for impacts to 0.3 acres of jurisdictional wetlands and 0 acres of isolated wetlands at its Atlas Scrap Yard site located at Camp James A. Garfield, 8451 State Route 5, Ravenna, OH 44266 in the Township of Paris, Portage County, Ohio. Based on the sale price of \$65,000 per acre of mitigation credit, the Client hereby agrees to pay S+W the amount of \$58,500.00 in consideration for the purchase of 0.9 forested and 0 non-forested wetland mitigation credits at Willow Creek. S+W will reserve the necessary wetland credits for a period of six (6) months (the "Reservation Period") upon receipt of a signed Purchase Agreement and a deposit payment of \$8,775.00 (equal to 15% of the total expected sale price). If Client has not received the necessary approvals pursuant to Section 404 and/or 401 of the Clean Water Act or the Ohio Isolated Wetland Permit program during the Reservation Period, S+W will extend the Reservation Period for an additional 6-months upon receipt of an additional 15% deposit received prior to the expiration of the initial 6-month Reservation Period. The remaining balance shall be paid within 12-months of the date of this contract.

B. If the remaining balance is not paid in full within 12-months, the Client, at their sole discretion, may extend the Reservation Period an additional 12 months under the following terms:

- 1) Client notifies S+W in writing of its intent to extend the agreement beyond the second Reservation Period not less than 30 days after the expiration of the second Reservation Period.
- 2) At the end of the second Reservation Period, the unit price of the credits will change to match the current unit price for credits from the Willow Creek.
- 3) Client completes a third deposit payment not less than 30 days after the expiration of the second Reservation Period. The third deposit payment shall be equal to forty-five percent of the total purchase price, based on the current unit cost, less previous deposit payments.

- 4) All deposit payments made by Client shall be applied towards the remaining balance due based current unit cost of the credits.
- C. The Client's initial 15% deposit is refundable if within the initial 6-month Reservation Period the Corps or the Ohio EPA denies Client's request for a permit for the wetland impact or if Client elects to withdraw their permit application, provided the Client notifies S+W in writing of the denial of its permit or its intention to withdraw its permit application prior to the expiration of the initial 6-month Reservation Period. After the initial 6-month Reservation Period all deposit payments are non-refundable and shall be retained by S+W. If the Reservation Period expires due to lack of timely completion of additional deposit payments after the initial 6-month Reservation Period, the wetlands credits will no longer be reserved for Client but will be available on a first-come basis to all clients of S+W. S+W will provide written notification of the termination of this Agreement to the Corps and/or Ohio EPA as applicable.
- D. **This mitigation is being purchased due to wetland impacts caused by a remedial action at the above referenced site (Atlas Scrap Yard) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Activities undertaken entirely on a CERCLA site by authority of CERCLA as approved or required by the EPA, are not required to obtain permits under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act.** Wetlands mitigation activities related to this project have been coordinated with the Ohio EPA and the U. S. Army Corps of Engineers and established in a Wetlands Mitigation Plan. As part of the Ohio EPA oversight of this CERCLA project, the Ohio EPA must approve the project Wetlands Mitigation Plan. Within thirty (30) days of Ohio EPA approval of the Wetlands Mitigation Plan, the Client will tender the outstanding balance of the cost of the mitigation credits. Upon Ohio EPA final approval of the Wetlands Mitigation Plan, Client will provide S+W with a copy of the final Wetlands Mitigation Plan and the Ohio EPA approval letter, which will serve as the issuance date for the project. If payment is not received by S+W by the end of the thirtieth day after the Ohio EPA approval letter Issuance Date, the Client will be considered to be in **Default of Payment**. Should the Client be in Default of Payment, a **late payment penalty** of \$500 or 2.0% interest per month, whichever is greater, shall be applied to the outstanding balance from the Issuance Date for each month or portion thereof until payment is received in full. It is the sole responsibility of the Client to ensure that they adhere to the terms of this agreement, including timely payment, and to the requirements in the Wetlands Mitigation Plan for the project described in paragraph I(A).
- E. If the Client is in Default of Payment for greater than sixty days (i.e. more than 90 days from Permit Issuance Date), this agreement shall be terminated and the credits will not be reserved for the Client and all payments shall be forfeited to S+W as its sole remedy for liquated damages. In this case, the Client, the Corps and/or Ohio EPA (as applicable) shall be notified by S+W that this agreement has been terminated and the credits are no longer reserved for the Client.
- F. The Client shall have no other obligation other than the payments detailed in this agreement for future maintenance or remedial measures of Willow Creek.

II. OBLIGATIONS OF STREAM + WETLANDS FOUNDATION

- A. S+W has available for sale mitigation credits at Willow Creek which have been approved by the IRT to mitigate for certain wetland impacts.
- B. In consideration for the payment of \$58,500.00 (plus penalties, if applicable, as per paragraph I(C) of this Agreement) by Client, S+W hereby agrees to provide 0.9 acres of wetland mitigation credits (as per paragraph I(A) of this agreement) at Willow Creek for the benefit of Client hereunder. S+W shall have all responsibility for assuring the restoration and the monitoring and maintenance of the wetlands as provided herein.
- C. S+W will provide written confirmation to the Client that full payment has been received for the purchase of wetland mitigation credits specified in this agreement.

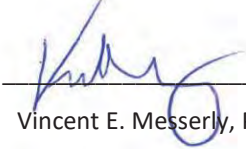
III. GENERAL PROVISIONS

A. This Agreement shall be governed and construed in accordance with the laws of the State of Ohio. Venue for the resolution of any dispute shall be in the Court of Common Pleas of Franklin County, Ohio or in the Federal court in the Southern District of Ohio in Columbus, Ohio.

B. The signatories hereto represent and covenant that they are authorized to execute this Agreement and to bind the respective parties to this Agreement.

C. This Agreement is the entire agreement between S+W and Client and supersedes any prior agreements of communications relating thereto. No modification hereof or subsequent agreement related to the sale of ILFP credits described herein shall be binding on either party unless reduced to writing and signed by both parties hereof.

STREAM + WETLANDS FOUNDATION

Signed By: 
Vincent E. Messerly, President

Date: 12/19/2024
123 South Broad Street, Suite 238
P.O. Box 369
Lancaster, OH 43130

CLIENT Ohio Army National Guard

Signed By: CALDWELL.THOMAS.PATRICK.1078866388 Digitally signed by CALDWELL.THOMAS.PATRICK.1078866388 Date: 2025.01.15 14:27:39 -05'00'

Printed Name: Thomas P. Caldwell, COL
Title: United States Property and Fiscal Officer for Ohio
Date: 1/15/25
Address: 2825 W. Dublin Granville Rd.
Columbus, OH 43235
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Telephone: 614-336-6568

CLIENT'S CONSULTING FIRM

Name: Davey Resource Group
Contact Name: Amy Allen
Address: 333 Martinel Drive, Kent OH 44240
E-mail: amymdallen@gmail.com
Phone Number: 206-499-6144

Attachment 3

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2825 West Dublin Granville Road
Columbus, Ohio 43235-2789

NGOH-IMR-EE

20 December 2024

SUBJECT: Memorandum to Document the Calculation of Wetlands Mitigation Acreage Purchased for the Remedial Action at RVAAP-50 Atlas Scrap Yard, Camp James A. Garfield JMTC, Ravenna, OH

PIKA-Insight, JV conducted a remedial action at the RVAAP-50 Atlas Scrap Yard Area of Concern, which involved excavation and transport and disposal or thermal treatment of contaminated soil. As part of this remedial action, wetlands were impacted and filled at two excavation sites, the ditch line in the Former Storage Area (FSA) and at the Former Incinerator Area (FIA). The Atlas Scrap Yard excavation work is complete and PIKA-Insight, JV is ready to reserve mitigation credits at the Stream & Wetlands (S&W) Willow Creek Wetland Mitigation Bank within the Mahoning-Shenango Watershed (HUC 05030103). The final wetland impact amount based on the completed excavation activities is 0.25 acres. The wetland area impacted aligns with the original estimate (0.16 Category 3 and 0.09 Category 1/2 gray zone). To account for any potential discrepancies, the Ohio Army National Guard (OHARNG) has opted to round the final impact amount of 0.25 acres to 0.30 acres. As previously discussed in the mitigation plan, a 3:1 mitigation ratio is being used for both wetland areas regardless of category. Therefore, the final mitigation credit amount to be reserved is 0.9 acres. The finalized mitigation contract is signed, and credits will be reserved. Upon approval from the Ohio EPA of the Final Wetlands Plan for the project, payment will be submitted to S&W Foundation. The mitigation reservation letter and/or credit purchase documentation from S&W will be provided to the Ohio EPA and USACE.

The Environmental Office POC for the Atlas Scrap Yard remedial action project is Ms. Kathryn S. Tait, OHARNG Environmental Specialist 3, who can be contacted at (614)336-6136 or kathryn.s.tait.nfg@army.mil.

////////////////////////////////S////////////////////////////////
Kathryn S. Tait
Environmental Specialist 3
Ohio Army National Guard