Ravenna Army Ammunition Plant Restoration Program

Public Notification and Public Meeting Summary Packet for:

Proposed Plan for Soil, Sediment, and Surface Water at RVAAP-06 C Block Quarry (final version dated March 25, 2020)

Proposed Plan for Soil, Sediment, and Surface Water at RVAAP-50 Atlas Scrap Yard (final version dated June 4, 2020)

> Public Comment Period: August 17, 2020 to September 16, 2020 Public Meeting: August 26, 2020

> > Contract No. W912QR-15-C-0046

Prepared for:



US Army Corps of Engineers®

U.S. Army Corps of Engineers Louisville District

Prepared by:



Leidos 8866 Commons Boulevard, Suite 201 Twinsburg, Ohio 44087

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PUBLIC NOTIFICATION

Public Notice



Public Notice

For Immediate Release Camp James A. Garfield Environmental Office

Camp James A. Garfield Joint Military Training Center

Camp James A. Garfield Environmental Office — 1438 State Route 534 SW — Newton Falls, OH 44444 614-336-6136

Public meeting to be held Wednesday, August 26, 2020 for Army National Guard Release of the Proposed Plans for Atlas Scrap Yard and C Block Quarry

Ravenna – The Army National Guard, in consultation with the Ohio Environmental Protection Agency, submits for public review and comments the Proposed Plans associated with historical former activities at the former Ravenna Army Ammunition Plant (RVAAP) in Portage and Trumbull counties, Ohio.

Atlas Scrap Yard and C Block Quarry are areas of concern (AOCs) within the former RVAAP in Portage and Trumbull Counties, Ohio. These AOCs are being addressed under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The Proposed Plans present the current status and information regarding the AOCs. The Proposed Plan for Atlas Scrap Yard presents two recommendations: 1) Excavation, Stabilization, and Off-site disposal of lead-contaminated soil; and 2) Ex-situ Thermal Treatment of PAH-contaminated soil. The Proposed Plan for C-Block Quarry presents a recommendation of Surficial Asbestos-Containing Material (ACM) Removal and Land Use Controls (LUCs).

On Wednesday, August 26, 2020, a public meeting will be held at the Camp James A. Garfield at 8451 State Route 5, Ravenna, Ohio 44266 beginning at 5:00 p.m., with an informal open house. Technical staff will be available to answer questions. At 5:30 p.m., the Army National Guard will briefly describe the assessment of the AOCs, present the preferred recommendations , and then request verbal or written comments from the public. Written comments regarding the recommendations may also be submitted to the Army National Guard during the 30-day comment period from August 17, 2020 to September 16, 2020. All written comments should be addressed to Camp James A. Garfield Environmental Office; 1438 State Route 534 SW, Newton Falls, OH 44444 and must be postmarked no later than September 16, 2020.

In accordance with CERCLA, the recommendations presented in the Proposed Plans are also presented in earlier Remedial Investigation (RI) and Feasibility Study (FS) reports. All reports are now available for public review at the RVAAP 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 the RVAAP Restoration Program public website, www.rvaap.org.

The final remedy for each AOC 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 August 17, 2020 to September 16, 2020. The Army National Guard encourages the public to review and comment on the recommendations presented in these documents.

For more information or to participate in the review, please visit the RVAAP Restoration Program website (www.rvaap.org) or call Katie Tait at 614-336-6136.

Affidavits

PROOF OF PUBLICATION STATE OF OHIO SS: CONNIE PACEK TRUMBULL COUNTY BEING DULY SWORN, UPON OATH STATES THAT SHE IS AN AUTHORIZED REPRESENTATIVE OF EASTERN OHIO NEWSPAPERS INC, PAH-co cial Asb Plan pro PUBLISHERS OF THE TRIBUNE CHRONICLE AND THE VINDICATOR (an The The edition of the Tribune Chronicle), NEWSPAPERS PRINTED AND IN THE GENERAL Proposed Plans tt. The Atlas Scra Proposed Plans 5:30 pm CIRCULATION OF TRUMBULL, MAHONING, COLUMBIANA COUNTIES IN and OHIO AND IN MERCER COUNTY IN PENNSYLVANIA. For more information or if you need contact Katle Tait at 614-336-6136. Off Pube Canal Street Plans Scrap for Al Stre THE ATTACHED ADVERTISEMENT WAS PUBLISHED IN the ē tor THE TRIBUNE CHRONICLE OPEN are WS available THE VINDICATOR WIN 2020 HOUSE Sci 00 2020 90 lea (ACN ap Plans RAUN of EVERY: Once and PUBLIC In informational of lans. Oral and v at) to Plan for C-Block (RVAAP) at Plan www.rvaap PUBL NC) CONSECUTIVE WEEKS AND FOR Oral ed to THAT THE FIRST INSERTION WAS ON #5284 ted speci J020 open house a ₹8 6 THE DAY OF org and the information repositories listed are 16, 2 Reed 167 E Land Q 2020. d Memorial Library East Main Street ; and 2) Ex-situ nments will Jam for or Public Common RVAAP are ave Use Controls (LUCs). Each Q Sel NAU 5 weather permitting) or James A. Garfield, the e and a public meetir nments will be accept es A. Garfield Envirc its will be accepted c **Garfield (Main Entrance)** Ohio 44266 ory and social modations to attend, #229-2T-August 16 & 23, 2020 SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE ON THIS 26TH AuguST 2020 DAY OF e accepted at t Thermal al distancing will be ob-tting) or alternate loca-ield, the guard will pro-X Ravenna Army e for public com-ccavation, Stabili-nal Treatment of endation of Surfiduring the NO TARY PUBLIC at the meet-ental Office: ng the public Proposed LAWRENCE J. KOVACH, Notary Public STATE OF OHIO SEA MY COMMISSION EXPIRES SEPTEMBER 23, 2022 ADVERTISING COST

Affidavit of Publication, Record-Courier, August 16, 2020 and August 23, 2020

31193093

Proof of Publication Record Publishing Company 1050 W. Main Street, Kent, OH 44240 Phone (330) 541-9400 Fax (330) 673-6363

I, TEresA 5.M. being first duly sworn depose and say that I am Advertising Clerk of **Record Publishing Company**

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 16th day of August, 2020 and that the fees charged are legal.

Deresa & Milam

Name of Account: Leidos Ad Number: 12665977 No. of Lines: 28

Day(s) Published: 08/16, 08/23. Printers Fee: \$240.40



Elizabeth McDaniel Notary Public Commission Expires June 19, 2021

Public Notice



Proposed Plans for Atlas Scrap Yard and C Block Quarry at the Former Ravenna Army Ammunition Plant (RVAAP) Available for Public Comment

The Proposed Plans for two Areas of Concern at the former RVAAP are available for public comment. The Atlas Scrap Yard Proposed Plan presents two recommendations: 1) Excavation, Stabilization, and Off-site disposal of lead-contaminated soll; and 2) Ex-situ Thermal Treatment of PAH-contaminated soil. The Proposed Plan for C-Block Quarry presents a recommendation of Surficial Asbestos-Containing Material (ACM) Removal and Land Use Controls (LUCs). Each Proposed Plan provides the rationale for these recommendations. The Proposed Plans are available at www.rvaap.org and the information repositories listed below:

Newton Falls Public Library 204 South Canal Street Newton Falls, Ohio 44444

Reed Memorial Library 167 East Main Street Ravenna, Ohio 44266

Please join us for an OPEN HOUSE and PUBLIC MEETING.

The Army National Guard will host an informational open house and a public meeting to explain the recommendations in the Proposed Plans. Oral and written comments will be accepted at the meeting. Written comments may also be mailed to the Camp James A. Garfield Environmental Office: 1438 State Route 534 SW, Newton Falls, OH 44444. Comments will be accepted during the public comment period from August 17, 2020 to September 16, 2020.

Due to COVID-19 safety precautions, face coverings are mandatory and social distancing will be observed. The public meeting will be held at an outdoor pavilion (weather permitting) or alternate location within Camp James A. Garfield. Once you arrive at Camp James A. Garfield, the guard will provide directions to the meeting venue. at:

The public meeting is scheduled for:

Wednesday August 26, 2020 5:00 pm Open House 5:30 pm Public Meeting

Camp James A. Garfield (Main Entrance) 8451 State Route 5 Ravenna, OH 44266

RC, Aug 16, 23, 2020, 12665977

For more information or if you need special accommodations to attend, please contact Katie Tait at 614-336-6136.

PUBLIC MEETING

Sign-in Sheet



SIGN-IN SHEET

US Army Corps of Engineers Louisville District

Camp James A. Garfield Public Meeting – Proposed Plan for C Block Quarry and Atlas Scrap Yard at the Former Ravenna Army Ammunition Plant

PLEASE PRINT LOCATION: Camp James A. Garfield; Ravenna, OH DATE: August 26, 2020 TIME: 5:30 p.m. Name Address/City/State/Zip Email Phone Katie Tait -ed Thomas anna VEL. amartha Coldwell IN LANGEL malaice Sarah Lock

CAMP JAMES A. GARFIELD PUBLIC MEETING SIGN-IN SHEET

Proposed Plan for C Block Quarry and Atlas Scrap Yard at the Former Ravenna Army Ammunition Plant				
PLEASE PRINT				
LOCATION: Camp James A. Garfield; Ravenna, OH		DATE: August 26, 2019		TIME: 5:30 p.m.
Name	Address/City/S	State/Zip	Phone	Email
Tina Lembay				
Gary Lemley				
Tina Lembey Gary Lemley Danielle Anderson				

Presentation





Proposed Plans for:

C Block Quarry Atlas Scrap Yard

Former Ravenna Army Ammunition Plant Ravenna, Ohio

Presented by: Heather Adams, P.G. – Leidos

August 26, 2020



US Army Corps of Engineers®







Areas of Concern

Two areas of concern (AOCs) addressing soil, sediment, and surface water:

- C Block Quarry
- Atlas Scrap Yard

Note: Groundwater at these sites is being evaluated and addressed under the Facility-wide Groundwater Monitoring Program (FWGWMP).









Presentation Agenda

- Description of CERCLA
- Site evaluation
- Site features
- Historical operations
- Remedial Investigations and conclusions
- Feasibility Study and preferred remedial alternative
- Public participation
- Questions





What is CERCLA?



- The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was passed in December 1980 in response to the discovery of a large number of abandoned, leaking hazardous waste sites that posed a serious threat to both human health and the environment.
- CERCLA was designed to impose cleanup and reporting requirements on the private sector, as well as federal facilities, by:
 - Identifying those sites where releases of hazardous substances had occurred or might occur and pose a serious threat to human health and the environment;
 - > Taking appropriate action to remedy those releases; and
 - Seeking those parties responsible for the environmental hazards to pay for the cleanup activities.
- This phase of the CERCLA process is to seek input from the public on the Preferred Alternative.





CERCLA Site Evaluation



- For each site, we will discuss the investigations conducted and summarize the following evaluations provided in the Remedial Investigation Report:
 - Human health risk assessment (HHRA) Conducted to determine if chemicals in soil, sediment, or surface water pose unacceptable risk.
 - Ecological risk assessment (ERA) Conducted to evaluate 1) if important or significant ecological resources are at a site (e.g., wetlands, protected species); and 2) if chemical contamination requires an action to protect those resources.
 - Fate and transport assessment Conducted to determine if chemicals at the site may adversely impact groundwater.
- These assessments determine if a site can be used for:
 - Unrestricted (Residential) Land Use The Army can use the site with no restrictions.
 - Commercial (Industrial) Land Use The Army can use the site, but restrictions will be placed on the site.





Location of AOCs





Figure 1, refer to handout.

C Block Quarry is RVAAP-06 Atlas Scrap Yard is RVAAP-50



Figure 2, refer to handout.



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C Block Quarry Site Features





- Approximately 0.96-acre AOC.
- Located in the northwestern portion of CJAG, at the Block C Storage Area (contains 99 aboveground storage igloos).
- Located between Roads 3C and 4C of the Block C Storage Area (refer to Figure 3, handout).
- C Block Quarry is located on a sandstone bedrock high.
- Surface water occurs intermittently as stormwater runoff flowing radially toward the quarry bottom.





C Block Quarry 1959 Aerial Photograph



- Block C Storage Area.
- Block C Quarry.



Parallel rows of 99 aboveground reinforced concrete igloos (formerly stored munitions).

Figure 3, refer to handout.









- 1940s and 1950s The quarry was mined for sandstone.
- March 1950 A conference was held to determine waste disposal for the former RVAAP.
 - > C Block Quarry was chosen for facility waste disposal.
 - Wastes included sulfuric acid, nitric acid, mercury, chromic acid, phosphoric acid plus accelerator, alkali compound stripper, and surfactants commonly used in detergents.
- 1950s and 1960s Used as a disposal area for annealing process wastes.
- Currently Unused, heavily forested with brush and trees.





C Block Quarry Previous Investigations



Historical Assessments and Investigations:

- 1982 Soil and Sediment Analysis
- 1982 Installation Reassessment of RVAAP
- 1986 Soil Contamination Survey
- 1989 RCRA Facility Assessment
- 1996 Preliminary Assessment for the Characterization of Areas of Contamination
- 1996 Relative Risk Site Evaluation

Remedial Investigations:

- > 2004/2005 Characterization of 14 AOCs
 - Assessed surface soil in the C Block Quarry.
- > 2010 PBA08 Remedial Investigation
 - Assessed surface and subsurface soil.
 - Completed vertical delineation of contamination where previous surface soil data exceeded screening criteria.
 - Completed an asbestos survey to address suspected asbestos-containing material (ACM) identified during 2008 site walk.
- 2012 PBA08 Remedial Investigation
 - Sampling to characterize chromium in soil.





C Block Quarry Remedial Investigations



- Remedial Investigation Summary
 - Multiple evaluations and investigations were conducted to assess surface and subsurface soil at the C Block Quarry.
 - > The total number of samples collected include:
 - Twenty-one surface soil
 - Ten subsurface soil
 - Seven sediment
 - Five surface water
 - Six building debris
 - The following chemical groups were analyzed during the investigations:
 - Metals, explosives, propellants, SVOCs, VOCs, PCBs, nitrates, herbicides, and pesticides.





C Block Quarry Conclusions of Remedial Investigations



- Nature and extent of contamination is defined. No further sampling is required to characterize surface or subsurface soil.
- Fate and transport modeling concluded that contaminant migration chemicals of concern in soil are not adversely impacting groundwater, and future impacts are not predicted.
- No further action for soil is required to protect groundwater.
 - > Groundwater will continue to be evaluated under the FWGWMP.
- The ERA concluded that no further action is required to protect ecological resources.
- The HHRA identified the following locations and chemicals as requiring remediation:
 - Soil at and near sample locations CBLss-003M and CBLss-005M Soil contaminated with hexavalent chromium and friable ACM.




C Block Quarry Contamination Extent



- CBLss-003M and CBLss-005M
 - Both locations exceeded Residential Cleanup Goal of 3 mg/kg.
 - ACM (transite and black tar paper) mixed with soil at both locations.

Figure 4, refer to handout.







C Block Quarry Remedial Action Objectives



Prevent:

- (1) Resident Receptor Exposure to hexavalent chromium in soil above 3 mg/kg at and near sampling locations CBLss-003M and CBLss-005M, and
- (2) Resident Receptor and Industrial Receptor Exposure to friable ACM at or near sampling locations CBLss-003M and CBLss-005M.









The following remedial alternatives were developed for consideration:

- Alternative 1: No Action (required by CERCLA)
- Alternative 2: Surficial ACM Removal and Land Use Controls (LUCs)
 - Remove surficial ACM through non-intrusive methods to prevent Industrial Receptor exposure to ACM in surface soil.
 - Implement LUCs to prevent the Industrial Receptor from digging and possibly encountering ACM in subsurface soil.
 - Implement LUCs to prevent Resident Receptor use of the site.
 - Perform 5-year reviews to assess effectiveness of LUCs and determine if modifications are required.
- Alternative 3: Excavation and Off-Site Disposal (Attain Unrestricted Residential Land Use)
 - Conduct subsurface evaluation of ACM.
 - Complete pre-excavation and waste characterization sampling.
 - Excavation of surface and subsurface soil to remove COC-contaminated soils and ACM.
 - Site restoration (backfilling, grading, and seeding).







C Block Quarry Feasibility Study – Alternative Evaluation

These three alternatives were compared against one another using the criteria below:

- Threshold Criteria
 - Protectiveness of human health and the environment (Alternative 1: No Action will not protect human health and is eliminated from consideration.)
 - Compliance with applicable or relevant and appropriate requirements (ARARs) – Assesses if the alternative complies with federal or local laws and standards.
- Balancing Criteria
 - Long-term effectiveness Evaluates magnitude of remaining risk/contamination.
 - > Reduction of toxicity, mobility, or volume through treatment.
 - Short-term effectiveness Evaluates protection of workers and the community during implementation of the remedial alternative.
 - Implementability Evaluates availability and reliability of the alternative's technology.
 - > Estimated cost.







C Block Quarry Feasibility Study – Alternative Evaluation

- Modifying Criteria
 - Formally evaluated as part of the Record of Decision and after the public has had the opportunity to comment on the Proposed Plan.
 - State acceptance Comments received from state agencies (Ohio EPA).
 - Community acceptance Considers comments made by the community, including stakeholders, on the remedial alternatives being considered.







C Block Quarry Preferred Alternative

Alternative 2: Surficial ACM Removal and Implementation of LUCs

- Implementation of this alternative will result in the removal of surficial ACM, prevent unrestricted residential land use, and prohibit digging by the industrial receptor.
- This alternative meets the threshold and primary balancing criteria, and the established Remedial Action Objectives.
- Implementation will comply with ARARs (federal and local laws/standards).
- Measures will take place to ensure the site workers and community are not impacted during implementation.
- Long-term effectiveness Protective of industrial land use with a no digging restriction. The Army does not intend future unrestricted (Residential) land use at C Block Quarry.
- Estimated Cost for Alternative 2 (\$108,534) is less than the estimated cost to implement Alternative 3 (\$390,224).





Atlas Scrap Yard Site Features





- Located in the southeastern portion of CJAG, southwest of the intersection at Newton Falls Road and Paris-Windham Road.
- 73-acre AOC.
- Interior composed of shrub/scrub vegetation. Forested around the perimeter. North-central portion is sparsely vegetated (cover mostly gravel and mulch-like material).
- All buildings/structures demolished except a brick structure associated with the former incinerator and the slab of the former Building T-3901.
- Remaining features include several slag/gravel access roads that enter from the north and east, a crushed slag parking lot in the north-central portion, and drainage ditches that parallel access roads.
- Topographically, the site is a low area (higher in the northwest, lower in the centraleast).
- No perennial surface water. However, nine small wetlands were identified.





Atlas Scrap Yard Site Features



Location of the Former Storage Area



Location of the Former Incinerator Area

Figure 5, refer to handout.



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Atlas Scrap Yard Historical Operations



- Atlas Scrap Yard has served several operational functions over the history of the former RVAAP – Never used for munitions production activities.
- 1940-1945 Served as a construction camp to house workers and families during construction of the facility.
- 1945 (end of WWII) Majority of buildings and structures were demolished or relocated.
- Post WWII through 1950s Four new structures added. These buildings supported facility road and ground maintenance activities.
- Post Vietnam War (1975) All remaining structures razed.
- North-central portion of Atlas Scrap Yard used as a storage/stockpile area for bulk materials (gravel, railroad ballasts, sand, culvert pipe, railroad ties, and telephone poles).





Atlas Scrap Yard Previous Investigations



Historical Assessments and Investigations:

- 1978 Installation Assessment
- 1996 Preliminary Assessment for the Characterization of Areas of Contamination
 1996 Relative Risk Site Evaluation
- 1998 Environmental Baseline Survey of RVAAP

Remedial Investigations:

- 2004/2005 Characterization of 14 AOCs
 - > Assessed surface soil, collected geotechnical data, and completed a geotechnical investigation over two former service stations with underground storage tanks.
- 2010 PBA08 Remedial Investigation
 - > Completed a source area investigation for surface soil to delineate the extent of previously identified contamination.
 - Large-grid Incremental Sampling Methodology (ISM)
 - Purpose Complete environmental characterization for the entire Atlas Scrap Yard
 - Grids Ranged in size from 3.1 to 4.2 acres.
- 2011 Supplemental Sampling
 - > Refine polcyclic aromatic hydrocarbon (PAH) contamination at the Former Storage Area.
 - Features targeted during sampling activities Debris Piles (railroad ties, concrete, igodolrubble), Parking Areas made of slag/asphalt gravel (west of railroad ties), and Ditch along access road (entering Atlas Scrap Yard from Newton Falls Road).





Atlas Scrap Yard Remedial Investigations



• Summary

Multiple evaluations and investigations were conducted to assess surface soil, subsurface soil, sediment, and surface water at the Atlas Scrap Yard.

Characterization of 14 AOCs

- Thirty-three ISM soil samples.
- One ISM sediment sample.
- Geotechnical borings.
- Additional activities completed but not included in characterization.

> 2010 Remedial Investigation

- Nineteen ISM surface soil samples.
 Eighteen large-grid ISM soil samples.
 Three discrete chromium speciation surface soil samples.
- Nineteen subsurface soil borings.
- One co-located sediment surface water sample from Load Line 12 incorporated into evaluation.
- Surface water from Atlas Scrap Yard discharges to Load Line 12.





Atlas Scrap Yard Remedial Investigations



- Summary (Continued)
 - > 2011 Supplemental Sampling.
 - Sixteen ISM surface soil samples (refine delineation of PAH contamination at Debris Piles, Parking Area, and Ditch).
 - The following chemical groups were analyzed during the investigations:
 - Metals, explosives, propellants, SVOCs, VOCs, PCBs, nitrates, herbicides, and pesticides.





Atlas Scrap Yard Remedial Investigations Conclusions



- Nature and extent of contamination is defined. No further sampling is required to characterize surface soil, subsurface soil, surface water, and sediment.
- Fate and transport modeling, along with weight-of-evidence factors, concluded that contaminant migration chemicals of concern in sediment and soil are not adversely impacting groundwater.
- No further action for sediment or soil is required to be protective of groundwater.
 - > Groundwater will continue to be evaluated under the FWGWMP.
- ERA
 - > Level I Scoping ERA determined a Level II Assessment was required.
 - Level II ERA determined that no further action is required to protect ecological resources.





Atlas Scrap Yard Remedial Investigations Conclusions



- The HHRA concluded that there were no chemicals of concern in surface water, sediment, or subsurface soil that would require a Remedial Action to be protective of the Resident Receptor, Industrial Receptor, or National Guard Trainee.
- The HHRA did identify two areas at Atlas Scrap Yard that would require a remedial action and evaluation under a Feasibility Study.
 - Former Incinerator Area (FIA)
 - Former Storage Area (FSA)





Atlas Scrap Yard Former Incinerator Area (FIA)





- Background
 - Located in the southern section of Atlas Scrap Yard.
 - The former incinerator consists of a 12-foot-long by 8-foot-wide primary chamber that is empty.
 - A 14-foot-high chimney is currently attached to the primary chamber.
 - The outside structure associated with the former incinerator is currently present.
 - All other components of the incinerator have been razed.

(Refer to Figure 5 of the handout for location of FIA.)





Atlas Scrap Yard Former Incinerator Area (FIA)



- Remedial Investigation Conclusions for the FIA
 - > Elevated lead concentrations identified in surface soil (0-1 foot BGS).
 - General area around sampling locations ASYss-019M and ASYsb-064 will require remediation to be protective of Unrestricted (Residential) Land Use, National Guard Training Land Use, and Commercial Industrial Land Use.
 - Lead concentrations at these sample locations exceeded Cleanup Goals for the Resident Receptor, National Guard Trainee, and Industrial Receptor.
 - > Cleanup Goal for the Resident Receptor is 400 mg/kg.
 - > No other areas at Atlas Scrap Yard require remediation for lead.
 - > No other chemicals of concern require remediation at the FIA.

(Refer to Figure 6 of the handout for extent of lead contamination and area requiring remedial action.)





Atlas Scrap Yard Former Incinerator Area (FIA)





Figure 6, refer to handout.



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Atlas Scrap Yard FIA – Remedial Action Objective



Prevent:

(1) Resident Receptor Exposure to lead in surface soil (0-1 foot BGS) above 400 mg/kg at the FIA.









The following remedial alternatives were developed for consideration:

- Alternative 1: No Action (required by CERCLA).
- Alternative 2: Excavation, Stabilization, and Off-Site Disposal of Surface Soil at the FIA.
 - > Achieves Unrestricted Residential Land Use.
 - > The incinerator will be demolished and removed.
 - Brick and grout tested for TCLP metals, PCBs, and asbestos (September 2018 Results under regulatory limits).
 - > Other materials within the incinerator will require waste characterization.
 - > Pre-excavation delineation sampling required.
 - > Excavation estimated at 244 cubic yards.
 - > Excavated soil will be stabilized on-site and tested until confirmed non-hazardous.
 - > Post confirmatory sampling of excavation floor and side walls.
 - > Restoration (backfilling, regrading, and seeding).









Remedial alternatives (continued):

- Alternative 3: Excavation and Off-Site Disposal of Surface Soil.
 - > Achieves Unrestricted Residential Land Use.
 - > Other materials within the incinerator will require waste characterization.
 - Brick and grout tested for TCLP metals, PCBs, and asbestos (September 2018 Results under regulatory limits).
 - > Pre-excavation delineation sampling required.
 - > Contaminated soil would be treated as hazardous waste.
 - > Post confirmatory sampling of excavation floor and side walls.
 - > Restoration (backfilling, regrading, and seeding).





Atlas Scrap Yard FIA Feasibility Study – Alternative Evaluation



These three alternatives were compared against one another using the criteria below:

- Threshold Criteria
 - Protectiveness of human health and the environment (Alternative 1: No Action will not protect human health and is eliminated from consideration.)
 - Compliance with ARARs Assesses if the alternative complies with federal or local laws and standards.
- Balancing Criteria
 - > Long-term effectiveness Evaluates magnitude of remaining risk/contamination.
 - > Reduction of toxicity, mobility, or volume through treatment.
 - Short-term effectiveness Evaluates protection of workers and the community during implementation of the remedial alternative.
 - Implementability Evaluates availability and reliability of the alternative's technology.
 - > Estimated cost.







Atlas Scrap Yard FIA Feasibility Study – Alternative Evaluation

- Modifying Criteria
 - Formally evaluated as part of the Record of Decision and after the public has had the opportunity to comment on the Proposed Plan.
 - State acceptance Comments received from state agencies (Ohio EPA).
 - **Community acceptance** Considers comments made by the community, including stakeholders, on the remedial alternatives being considered.







Atlas Scrap Yard FIA – Preferred Alternative

Alternative 2: Excavation, Stabilization, and Off-Site Disposal of Surface Soil at the FIA

- Attains Unrestricted Residential Land Use.
- Green and highly sustainable alternative.
- Reduces mobility of contaminants that will be disposed of in an off-site facility.
- Technically and administratively feasible as excavation and stabilization agents are common and successful in treating lead-contaminated soil.
- Long-term effectiveness Highly effective as contaminants will be removed from the site.
- Estimated cost for Alternative 2 (\$235,655) is less than estimated cost to implement Alternative 3 (\$372,578).









- Background
 - > Located in the north-central section of Atlas Scrap Yard.
 - > Approximately 14.9 acres.
 - Post Vietnam War (1975) Used as a stockpile storage area for bulk material, including gravel, railroad ballasts, sand, culvert pipe, railroad ties, and telephone poles.
 - > 2017 Removal of railroad ties, timber, concrete, and asphalt.
 - 1,160 tons of rail ties and telephone poles.
 - 1,655 tons of concrete and asphalt.
 - Waste characterization sampling non-hazardous.
 - Off-site disposal.

(Refer to Figure 5 of the handout for location of FSA.)





Atlas Scrap Yard Former Storage Area (FSA)



- Remedial Investigation Conclusions for the FSA
 - PAHs detected at numerous sample locations at concentrations exceeding 2017 USEPA Resident Soil Regional Screening Levels (RSLs).
 - Refer to Figure 7 for the 2004/2005 and 2010 PAH results (handout).
 - Refer to Figure 8 for the 2011 PAH results (handout).
 - > Large majority of exceedances are within the FSA.
 - Three locations outside the FSA exceed benzo(a)pyrene 2017 USEPA Resident Soil RSLs. However, remedial action is not required to be protective of Residential Receptor.
 - ASYss-069M the following Weight-of-Evidence was provided:
 - > Four of five PAHs detected below RSLs.
 - Benzo(a)pyrene (1.7 mg/kg) slightly exceeds RSL (1.1 mg/kg).
 - Surface soil at boring ASYsb-059 (within ASYss-069M ISM) was below Soil Resident RSLs. Subsurface soil was non-detect.
 - ISM location was taken within a larger ISM area (ASYss-091M) where PAH concentrations in surface soil were all below RSLs.





Atlas Scrap Yard Former Storage Area (FSA)



- Remedial Investigation Conclusions for the FSA (continued)
 - ASYss-071M (Weight-of-Evidence)
 - Four of five PAHs detected below RSLs.
 - Large portion of sample area was located within the southern access road, which may have contributed to the elevated benzo(a)pyrene results.
 - ISM location was selected within a larger ISM area (ASYss-096M) where PAH concentrations in surface soil were all below RSLs.
 - ASYss-101M (Weight-of-Evidence)
 - Four of five PAHs detected below RSLs.
 - Benzo(a)pyrene (1.4 mg/kg) slightly exceeds RSL (1.1 mg/kg).
 - Sample location likely contributed to elevated benzo(a)pyrene. Adjacent to Paris-Windham Road and within the southern access road to Atlas Scrap Yard.







Atlas Scrap Yard FSA – 2004/2005 and 2010 PAH Results



Figure 7, refer to handout.











Figure 8, refer to handout.



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Atlas Scrap Yard Former Storage Area (FSA)



- Remedial Investigation Conclusions for the FSA (continued)
 - Remediation is required to be protective of the Industrial Receptor at location ASYss-126M (Refer to Figure 9, handout).
 - Benzo(a)pyrene concentration of 50 mg/kg.
 - Cleanup goal is 21 mg/kg.
 - Remediation is required at the entirety of FSA to attain Unrestricted Residential Land Use (Refer to Figure 10, handout).





Atlas Scrap Yard FSA – Area Requiring Remedial Action (Commercial/Industrial)





Figure 9, refer to handout.



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Atlas Scrap Yard FSA – Area Requiring Remedial Action (Residential/Unrestricted)





Figure 10, refer to handout.



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Atlas Scrap Yard FSA – Remedial Action Objective



Prevent:

(1) Resident Receptor Exposure to PAHs (benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, and dibenz[a,h]anthracene) in surface soil (0-1 foot BGS) above Cleanup Goals at the FSA.









The following remedial alternatives were developed for consideration:

- Alternative 1: No Action (required by CERCLA).
- Alternative 2: Excavation and Off-Site Disposal of Surface Soil at ASYss-126M.
 - > Achieves Commercial/Industrial Land Use.
 - Estimated excavation is 316 cubic yards.
 - Post confirmatory sampling of excavation floor and side walls.
 - > Restoration (backfilling, regrading, and seeding).
 - > PAH COCs will remain onsite above Residential Cleanup Goals.
 - > LUCs to restrict Resident Receptor Exposure.
 - > 5-Year reviews to assess effectiveness of LUCs.
- Alternative 3: Ex Situ Thermal Treatment of Surface Soil at ASYss-126M.
 - Achieves Commercial/Industrial Land Use.
 - Total estimated volume requiring treatment 473 cubic yards.
 - Excavated contaminated soil fed into treatment system.
 - Post treatment soil sampling and excavation floor and wall confirmation sampling.
 - Site restoration (treated soil backfilled, graded, and seeded).









Remedial alternatives (continued):

- > PAH COCs will remain on-site above Residential Cleanup Goals.
- > LUCs to restrict Resident Receptor Exposure.
- > 5-year reviews to assess effectiveness of LUCs.
- Alternative 4: Excavation and Off-Site Disposal of Surface Soil at FSA.
 - > Achieves Residential Unrestricted Land Use.
 - Estimated excavation is 20,336 cubic yards.
 - > Post confirmatory sampling of excavation floor and side walls.
 - Restoration (backfilling, regrading, and seeding).
- Alternative 5: Ex Situ Thermal Treatment of Surface Soil at FSA.
 - > Achieves Residential Unrestricted Land Use.
 - > Total estimated volume requiring treatment 30,505 cubic yards.
 - > Excavated contaminated soil fed into treatment system.
 - Post treatment soil sampling and excavation floor and wall confirmation sampling.
 - > Site restoration (treated soil backfilled, graded, and seeded).





Atlas Scrap Yard FSA Feasibility Study – Alternative Evaluation



These five alternatives were compared against one another using the criteria below.

- Threshold Criteria
 - Protectiveness of human health and the environment (Alternative 1: No Action will not protect human health and is eliminated from consideration.)
 - Compliance with ARARs Assesses if the alternative comply with federal or local laws and standards.
- Balancing Criteria
 - > Long-term effectiveness Evaluates magnitude of remaining risk/contamination.
 - > Reduction of toxicity, mobility, or volume through treatment.
 - Short-term effectiveness Evaluates protection of workers and the community during implementation of the remedial alternative.
 - Implementability Evaluates availability and reliability of the alternative's technology.
 - > Estimated cost.







- Modifying Criteria
 - Formally evaluated as part of the Record of Decision and after the public has had the opportunity to comment on the Proposed Plan.
 - State acceptance Comments received from state agencies (Ohio EPA).
 - **Community acceptance** Considers comments made by the community, including stakeholders, on the remedial alternatives being considered.






Atlas Scrap Yard FSA – Preferred Alternative

Alternative 3: Ex Situ Thermal Treatment of Surface Soil at ASYss-126M

- Attains Commercial and Industrial Land Use.
- Effective long-term treatment of benzo(a)pyrene in surface soil.
- Green and highly sustainable alternative for on-site treatment and reuse of soil.
- Reduces toxicity, mobility, and volume of contaminants in soil.
- Estimated cost for Alternative 2 is \$224,194, including an estimated \$97,978 for LUCs.
- In the event a thermal treatment system is not available, Alternative 2 (Excavation and Off-Site Disposal of Surface Soil at ASYss-126M) would be readily available.





Atlas Scrap Yard (FSA) Example of Thermal Treatment System





- Soil loaded into treatment system.
- Contaminated soil exposed to high temperatures in "Renewal Chamber."
- Soil contaminants (e.g., PAHs) are desorbed to form vapors.
- Vapors are then passed through filters for capture and/or treatment.

- Treated soil is stockpiled for confirmation testing.
- If soil is confirmed to be below the Cleanup Goal, soil is placed back in the excavation.





RVAAP Areas Requiring LUCs with Preferred Alternative





Figure 11, refer to handout.



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Public Participation Your Comments and Inputs are Appreciated!



- Public participation is an important component of remedy selection.
- The U.S. Army is soliciting input from the community as part of its public participation responsibilities under Section 117(a) of CERCLA.
- Public comment period is August 17 to September 16, 2020.





Public Participation Your Comments and Inputs are Appreciated!



- Provide written or verbal comments at this public meeting.
- Submit written comments by September 16, 2020 to the following address:

Camp James A. Garfield Environmental Office Attn: Katie Tait 1438 State Route 534 SW Newton Falls, Ohio 44444

E-mail address: kathryn.s.tait.nfg@mail.mil







Questions?



US Army Corps of Engineers®

Court Reporter Transcript

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PROPOSED PLANS FOR SOIL, SEDIMENT AND SURFACE WATER AT C BLOCK QUARRY AND ATLAS SCRAP YARD

FORMER RAVENNA ARMY AMMUNITION PLANT RAVENNA, OHIO

Presented by: Heather Adams, P.G. - Leidos

> PUBLIC MEETING Wednesday August 26, 2020

Camp James A. Garfield 8451 State Route 5 Ravenna, Ohio 44266

- - -

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1 APPEARANCES:

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 3
          Samantha Coldwell, Facilitator
 4
 5
          Heather Adams, P.G.
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          jed.h.thomas@leidos.com
16
17
18
    ALSO PRESENT:
          Kevin Sedlak, ARNG
19
          Katie Tait, OHARNG
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21
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23
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1 MS. COLDWELL: Good evening, 2 everyone. Welcome to the public meeting. My 3 name is Samantha Coldwell. I am a private 4 citizen from Akron, Ohio. I am here tonight to 5 serve as the meeting's facilitator.

6 This public meeting serves as one of several 7 opportunities for public comment on the Army's 8 proposed plans. I am responsible for ensuring 9 that everyone who wishes to comment about the 10 proposed plans has an opportunity to do so.

Before we get started tonight, please review the COVID-19 safety precautions. Please keep a face covering or mask on at all times. Please maintain a distance of at least six feet, and do not adjust the seating arrangements. Please take a moment to silence all electronic devices.

There is a rest room located just outside the garage door exit to your right. Please help yourself to the bottled water available located near the front entrance.

This public meeting will present the Army's proposed plans for soil, sediment and surface water media at two sites within the Former Ravenna Army Ammunition Plant. These two sites are C Block Quarry and Atlas Scrap Yard. Comments received from the public on the proposed plans will be considered when determining the final remedy that will be documented in Records of Decision. The Records of Decision will include a Responsiveness Summary addressing public comments.

7 Tonight we have Kevin Sedlak representing 8 the Army. In addition, we have a court reporter 9 here to document tonight's meeting. Due to 10 restriction on attendance in response to COVID-19 11 safety precautions, representatives from the Ohio 12 EPA could not attend this meeting.

However, Ohio EPA has asked that I read their concurrence letters during this public meeting for the administrative record. Please refer to your handouts for copies of the Ohio EPA approval letters.

The first approval letter is dated April 30, 18 19 The second paragraph reads, "Ohio EPA has 2020. 20 no comments to the Final Proposed Plan. Based on 21 the information contained in the Final Proposed Plan document, other investigation documents and 22 23 reports, and Ohio EPA's oversight participation 24 during the investigations, Ohio EPA concurs with 25 the Final Proposed Plan for RVAAP-06, C Block

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Quarry recommending Removal of Surficial Asbestos
 Containing Materials and Land Use Controls.

3 "If you have questions concerning this
4 letter, please contact Kevin Palombo at 3305 963-1292."

6 The second approval letter received, dated 7 July 8, 2020, the second paragraph reads, "Ohio 8 EPA has no comments on the Final Proposed Plan 9 (PP). Based on the information contained in the Final PP document, other investigation 10 11 documents and reports, and Ohio EPA's oversight 12 participation during the investigation, Ohio EPA 13 concurs with the Final PP document for soil, 14 sediment and surface water at RVAAP-50 Atlas 15 Scrap Yard recommending excavation, stabilization 16 and off-site disposal of surface soil in the Former Incinerator Area to attain residential 17 18 land use and ex-situ thermal treatment of surface 19 soil in the Former Storage Area to attain 20 commercial/industrial land use.

21 "If you have any questions concerning this 22 letter, please contact Edward D'Amato at 330-23 963-1170."

Our presenter tonight is Heather Adams.
Heather is an Environmental Project Manager and

6 Geologist from Leidos, which is a contractor for 1 2 the Army. Heather will present information 3 regarding the two sites and the Army's proposed 4 plans for these sites. 5 Following the presentation, we will open the 6 floor for your questions and comments. 7 MS. ADAMS: Thank you, 8 Samantha. 9 Welcome everyone. As Samantha introduced, I 10 will be discussing two areas of concern this 11 evening; C Block Quarry and Atlas Scrap Yard. Т will be discussing how soil, sediment and surface 12 13 water has been addressed at both of those areas 14 of concern. 15 As you may be familiar, groundwater at these sites is being evaluated and addressed under the 16 17 Facility-wide Groundwater Monitoring Program and 18 will not be further discussed under this 19 presentation. 20 I will start off by briefly going over the 21 I will begin with just a general agenda. 22 description of CERCLA; and then I will go over 23 the site evaluation and features; the historical 24 operations; the Remedial Investigations and 25 conclusions; the Feasibility Study and preferred

1 remedial alternatives for each of the sites; and 2 then we will discuss the public's participation 3 and open up the floor for questions.

What is CERCLA? CERCLA stands for the
Comprehensive Environmental Response,

6 Compensation and Liability Act. This was passed 7 in December of 1980 in response to the discovery 8 of a large number of abandoned, leaking hazardous 9 waste sites that posed a serious threat to both 10 human health and the environment.

11 CERCLA was designed to impose cleanup and 12 reporting requirements on the private sector, as 13 well as Federal facilities by the following three 14 actions:

First, identifying those sites where releases of hazardous substances has occurred or might occur and pose a serious threat to human health and the environment.

Second, taking appropriate action to remedythese releases.

And, finally, the third, to seek those parties responsible for the environmental hazards to pay for the cleanup activities.

Here tonight, we are in the phase of the CERCLA process, which is seeking input from the public on the preferred alternatives at our
 sites.

For each site, we will discuss the investigations conducted and summarize the following evaluations that are provided in the Remedial Investigation Reports.

First are Human Health Risk Assessments.
These are conducted to determine if chemicals
in soil, sediment and surface water pose
unacceptable risk.

11 The second is the Ecological Risk 12 Assessment. This is conducted to, one, evaluate 13 if important or significant ecological resources 14 are present at the site. For example, wetlands 15 or protected species. And, two, if chemical 16 contamination requires an action to protect those 17 resources.

Finally, a Fate and Transport Assessment is completed to determine if chemicals at the site may adversely impact groundwater.

These assessments are used to determine if the site can be used in the future. Unrestricted Residential Land Use means that the Army can use the site with no restrictions. Commercial/ Industrial Land Use means that the Army can use the site, but there will be restrictions in placeon the site and the use.

If you refer to your handout packet, you can see Figure 1 and Figure 2 for the general locations of the sites that I will be presenting this evening.

C Block Quarry is located in the northern
portion of the facility. And Atlas Scrap Yard is
located in the southern portion of the facility.

I will first present to you the findings from C Block Quarry. This is a relatively small AOC at .96 acres. It is located in the northwest portion of CJAG, at C Block Storage Area. This is an area that contains 99 aboveground storage igloos.

Our site is located between Roads 3C and 4C of the C Block Storage Area. If you refer to Figure 3 of your handouts, you can see that location a little better.

20 C Block Quarry is located on a sandstone 21 bedrock high, and surface water only occurs 22 intermittently at the site as stormwater runoff, 23 which flows radially towards the bottom of the 24 quarry.

Figure 3 of your handout is an aerial

25

9

photograph from 1959, which shows what the Block
 C Storage Area looked like and where C Block
 Quarry is located within that Storage Area.

Between the 1940s and the 1950s, the quarry
was mined for sandstone. In March of 1950, a
conference was held to determine waste disposal
practices for the RVAAP.

8 C Block Quarry was chosen at that meeting 9 for a facility waste disposal site. Wastes 10 included sulfuric acid, nitric acid, mercury, 11 chromic acid, phosphorous -- phosphoric acid as 12 an accelerator, alkali compound stripper and 13 surfactants commonly used in detergents.

Between the 1950s and the 1960s, C Block Quarry was used as a disposal area for annealing processing wastes. Currently the site is not used and is heavily forested with brush and trees.

Between 1982 and 1996, C Block Quarry was
included in several historical assessments and
investigations. Those included Soil and Sediment
Analysis, Installation Reassessment of RVAAP,
Soil Contamination Survey, the RCRA Facility
Assessment, the Preliminary Assessment and the
Relative Risk Site Evaluation.

Then in 2004, the Remedial Investigations 1 2 began at C Block Quarry under the Characterization of 14 AOCs. During this 3 4 investigation, surface soil was assessed at C 5 Block Quarry. Then again in 2010, the PBA08 Remedial 6 7 Investigation completed -- I am sorry. 8 MS. COLDWELL: I am sorry. 9 MS. ADAMS: That is okay. 10 Where surface soil and subsurface soils were 11 assessed. We also completed vertical delineation 12 of contamination where previous surface soil data 13 exceeded screening criteria. 14 We also completed an asbestos survey to 15 address suspected asbestos-containing material, 16 also referred to as ACM in the presentation, that was identified during the 2008 site walk. 17 18 Then again in 2012, under the same PBA08 19 Remedial Investigation, additional sampling was 20 completed to characterize chromium in the soil. 21 Multiple evaluations and investigations were conducted to assess surface and subsurface soil 2.2 23 at C Block Quarry. The total number of samples 24 collected include 21 surface soil samples, 10 25 subsurface soil, 7 sediment, 5 surface water and

11

1 6 building debris samples.

The following chemical groups that were analyzed during the investigations include metals, explosives, propellants, SVOCs, VOCs, PCBs, nitrates, herbicides and pesticides.

And if you would like to flip to the third page of your packet, we have an acronyms list, which will help you define any of the chemicals or any of the other abbreviations that you see on the presentation.

11 Conclusions of the Remedial Investigation 12 are that nature and extent of contamination is 13 defined. No further sampling is required to 14 characterize surface or subsurface soil.

Fate and transport modeling concluded that contaminant migration chemicals of concern in soil are not adversely impacting groundwater, and future impacts are not predicted.

19 No further action for soil is required to 20 protect groundwater. And as I mentioned 21 previously, groundwater will continue to be 22 evaluated under the Facility-Wide Groundwater 23 Monitoring Plan.

The Ecological Risk Assessment concluded that no further action is required to protect 1 ecological resources.

Finally, the Human Health Risk Assessment identified the following locations and chemicals as requiring remediation: Soil at and near two sample locations, CBLss-003M and CBLss-005M. Soil within this area was determined to be contaminated with hexavalent chromium and friable ACM.

9 If you refer to Figure 4 of your handout, 10 you will see the results of our C Block Quarry 11 exceedances of the two locations that I 12 mentioned.

At both locations, the sample results exceeded the Residential Cleanup Goal of 3 milligrams per kilogram, and ACM was found to be mixed with soil at both locations. And the ACM was primarily composed of transite and black tar paper.

19 Two Remedial Action Objectives were 20 established for C Block Quarry. The first is 21 to prevent residential exposure of hexavalent 22 chromium in the soil above 3 milligrams per 23 kilogram at or near the sample locations 24 previously stated where exceedances were 25 identified. 1 And, two, to prevent Residential Receptors 2 and Industrial Receptor exposure to friable ACM 3 at or near those sample locations.

The following remedial alternatives were developed for consideration in the Feasibility Study to address these areas of contamination. Alternative 1 is a no action alternative. This is required by CERCLA.

9 Alternative 2 includes surficial ACM removal 10 and Land Use Controls. Under Alternative 2, we 11 would remove surficial ACM through non-intrusive 12 methods to prevent Industrial Receptor exposure 13 to ACM in surface soil. We would implement Land 14 Use Controls to prevent the Industrial Receptor 15 from digging and possibly encountering ACM in 16 subsurface soil. We would implement Land Use 17 Controls to prevent Residential Receptor use of 18 the site. And, finally, we would perform 5-year 19 reviews to assess effectiveness of the Land Use Controls and determine if modifications are 20 21 required.

Finally, we have Alternative 3, which includes the excavation and off-site disposal to attain Unrestricted Residential Land Use. Under this alternative, we would conduct a subsurface evaluation for ACM. We would complete pre excavation and waste characterization sampling.
 We would excavate the surface and subsurface soil
 to remove COCs -- COC-contaminated soils and
 ACM. And the site would be restored by
 backfilling, grading and seeding.

7 The three alternatives were compared against 8 one another using the criteria below: The first 9 criteria is the Threshold Criteria. This 10 includes evaluating the protectiveness of human health and the environment. Under this first 11 12 evaluation, Alternative 1, which was no action, will not -- we determined would not be protective 13 14 of human health and is eliminated from further consideration. 15

16 The second Threshold Criteria is the 17 compliance with applicable and relevant and 18 appropriate requirements, which are known as 19 ARARS. This assesses if the alternative complies 20 with federal and local laws and standards.

The second criteria is the Balancing Criteria. This looks at the long-term effectiveness and evaluates the magnitude of the remaining risk or contamination. It also looks at the reduction of toxicity, mobility and volume through treatment. It looks at the short-term effectiveness and evaluates the protection of workers and the community during implementation of the remedial action. It looks at implementability. This evaluates the ability and reliability of the alternative's technology. And, finally, there is an assessment for cost.

8 The third Modifying Criteria is formally 9 evaluated as part of the Record of Decision and 10 after the public has had the opportunity to 11 comment on the Proposed Plans.

There are two criteria: The state 12 acceptance, which are comments received from the 13 14 state agencies, which in our case is the Ohio 15 EPA, that we have already received. We also have 16 community acceptance. This considers comments 17 made by the community, including the 18 stakeholders, on the remedial alternatives being 19 considered.

For C Block Quarry, our preferred alternative is Alternative 2. This is the surficial ACM removal and implementation of Land Use Controls.

Implementation of this alternative will
 result in the removal of surficial ACM, prevent

unrestricted residential land use and prohibit
 digging by the Industrial Receptor.

This alternative meets the threshold and primary balancing criteria, and the established Remedial Action Objectives. Implementation will also comply with the ARARs, which is a reminder of the federal and local laws and standards.

8 Measures will take place to ensure that site 9 workers and the community are not impacted during 10 implementation.

With regards to long-term effectiveness, this alternative is protective of the industrial land use for a no digging restriction. And the Army does not intend further unrestricted residential land use at C Block Quarry.

The estimated cost for Alternative 2 is \$108,534, which is less than the estimated cost for Alternative 3, which was estimated at \$390,224.

The second Area of Concern that I am going to present is Atlas Scrap Yard. This AOC is located in the south -- sorry -- southeastern portion of CJAG, southwest of the intersection of Newton Falls Road and Paris-Windham Road. This is a much larger AOC at 73 acres. The interior of the AOC consists of a shrub/scrub vegetation, while the perimeter is forested. The north-central portion is sparsely vegetated and mostly covered with gravel and mulch-like materials.

All buildings and structures are demolished except the brick structure associated with the former incinerator and the slab of the former Building T-3901.

10 Remaining features at Atlas Scrap Yard 11 include several slag and gravel access roads that 12 enter from the north and the east, a crushed slag 13 parking lot in the north-central portion exists, 14 and drainage ditches run parallel to the access 15 roads.

16 Topographically, the site is a low area. It 17 is higher in the northwest and lower in the 18 central-east. There is no perennial surface 19 water at Atlas Scrap Yard. However, nine small 20 wetlands have been identified.

Two site features to note, if you can flip to Figure 5 of your handouts that I am going to discuss in a little more detail. This northern area right here is the location of the Former Storage Area. And the small piece right here is 1 the location of the Former Incinerator.

Atlas Scrap Yard served several operational functions over the history of the former RVAAP. However, it was never used for munitions activities -- production activities.

6 Between 1940 and 1945, it served as a 7 construction camp to house workers and families 8 during the construction of the facility.

9 In 1945, at the end of World War II, the 10 majority of the buildings and structures were 11 demolished or relocated.

12 Through the 1950s, four new structures were 13 added. These buildings supported facility road 14 and ground maintenance activities at the 15 facility.

16 Then in 1975, after the Vietnam War, all 17 remaining structures were razed.

The north-central portion of Atlas Scrap Yard was used as a storage/stockpile area for bulk materials. Those materials included gravel, railroad ballasts, sand, culvert pipe, railroad ties and telephone poles.

Similarly to C Block Quarry, Atlas Scrap
Yard has been included in several historical
assessments and investigations.

Between 1978 and 1998, it was included in the Installation Assessment, the Preliminary Assessment, the Relative Risk Site Evaluation and the Environmental Baseline Survey for RVAAP.

5 In 2004, Remedial Investigation activities 6 began under the Characterization of 14 AOCs. 7 Under this investigation, we assessed surface 8 soil, collected geotechnical data and completed 9 the geotechnical investigation over two former 10 service stations with underground storage tanks.

11 In 2010, the PBA08 Remedial Investigation 12 completed a source area investigation for surface 13 soil to delineate the extent of previously 14 identified contamination. Under this 15 investigation, we utilized a large Incremental 16 Sampling Methodology, a sampling process known as 17 The purpose of this was to provide a ISM. 18 complete environmental characterization of the 19 entire Atlas Scrap Yard. Grid samples ranged in 20 size from 3.1 to 4.2 acres in size.

Then in 2011, Supplemental Sampling was completed to refine the PAH contamination at the Former Storage Area. Features targeted during this sampling activity were the debris piles, which were comprised of railroad ties, concrete and rubble; the parking area, which was made of slag and asphalt gravel (west of the railroad tie piles); and the ditch along the access road entering Atlas Scrap Yard from Newton Falls Road.

6 Multiple evaluations and investigations were 7 conducted to assess surface soil, subsurface 8 soil, sediment and surface water at Atlas Scrap 9 Yard.

10 Under the Characterization of 14 AOCs 11 investigation; 33 ISM soil samples, 1 ISM 12 sediment sample, geotechnical borings and 13 additional activities were completed at the 14 site.

15 In 2010, under the Remedial Investigation, 19 ISM surface soil samples, 18 large-grid ISM 16 17 soil samples, 3 discrete chromium speciation soil 18 samples, 19 subsurface soil borings, 1 located --19 co-located sediment surface water sample from 20 Load Line 12, and surface water from Atlas Scrap 21 Yard that discharged into Load Line 12 was 2.2 included in that investigation.

As part of a 2011 Supplemental Sampling, an additional 16 ISM surface soil samples to refine the delineation of the PAH contamination at the debris piles, parking area and the ditch were
 completed.

The following chemical groups were analyzed during the investigations: Explosives, metals, propellants, SVOCs, VOCs, PCBs, nitrates, herbicides and pesticides.

I am going to take a breather.

8 Conclusions of the Remedial Investigation 9 were that nature and extent of contamination is 10 define. No further sampling is required to 11 characterize surface soil, subsurface soil, 12 surface water or sediment.

Fate and transport modeling, along with weight-of-evidence factors, concluded that contaminant migration chemicals of concern in sediment and soil are not adversely impacting groundwater.

No further action for sediment or soil is required to be protective of groundwater. And as stated previously, groundwater will continue to be evaluated under the Facility-Wide Groundwater Monitoring Program.

During the Ecological Risk Assessment
 evaluation, a Level I Scoping Ecological Risk
 Assessment determined that a Level II assessment

7

was required. A Level II Ecological Risk
 Assessment was completed and determined that no
 further action is required to protect ecological
 resources.

5 The Human Health Risk Assessment concluded 6 that there were no chemicals of concern in 7 surface water, sediment or subsurface soil that 8 would require a Remedial Action to be protective 9 of the Resident Receptor, Industrial Receptor or 10 the National Guard Trainee.

However, the Human Health Risk Assessment did identify two areas at Atlas Scrap Yard that would require Remedial Action for surface soils and require the evaluation under a Feasibility Study. Those two areas are the Former Incinerator Area and the Former Storage Area.

The first of those two areas is the Former 17 18 Incinerator Area that I will discuss. This area 19 is located in the southern section of Atlas Scrap 20 Yard. The former incinerator consists of a 21 12-foot long by 8-foot wide primary chamber that 22 is currently empty. It also has a 14-foot high 23 chimney, which you can see slightly in the 24 photograph, that is attached to the primary 25 chamber.

The outside structure associated with the former incinerator is currently present. All other components of the incinerator have been razed.

5 And you can refer to Figure 5 of your 6 handout to see more details of the former 7 incinerator.

8 The conclusions for the Former Incinerator 9 Area in the Remedial Investigation were that 10 elevated lead concentrations were identified in 11 surface soil. And this is surface soil that is 12 0-1 foot below ground surface.

General -- the general area surrounding location ASYss-19M and ASYsb-064 will be required for remediation to be protective of Unrestricted Residential Land Use, National Guard Training Land Use and Commercial/Industrial Land Use.

Lead concentrations at these sample locations exceeded cleanup goals for the Resident Receptor, National Guard Trainee and the Industrial Receptor.

The cleanup goal for the Resident Receptor is 400 milligrams per kilogram. No other areas at Atlas Scrap Yard require remediation for lead. Additionally, no other chemicals of concern require remediation at the Former
 Incinerator Area.

And you can refer to Figure 6 of your handout to see the lead contamination and the area required for remedial action. It is also on the screen here, but also some good photographs of the site feature that we are discussing.

8 Based on the conclusions of the Remedial 9 Investigation, the following Remedial Act --10 Remedial Action Objective was established for the 11 Former Incinerator Area at Atlas Scrap Yard. And 12 that is to prevent Residential Receptor exposure 13 to lead in surface soil above 400 milligrams per 14 kilogram.

Similarly how we presented the information for C Block Quarry, we will do the same for Atlas Scrap Yard. The following remedial alternatives were developed for consideration for the Former Incinerator Area.

20 One is the -- Alternative 1 is the no action 21 alternative. Alternative 2 included excavation, 22 stabilization and off-site disposal of surface 23 soil at the Former Incinerator Area.

Alternative 2 achieves the Unrestricted Residential Land Use. The incinerator will be 1 demolished under this plan and removed. In 2018, 2 the brick and grout had already been tested to 3 see if they were under the regulatory limits, 4 which they were.

The other materials within the incinerator 5 6 will require waste characterization. Pre-7 excavation delineation sampling will be required. 8 They estimate the excavation to be 244 cubic 9 Excavated soil will be stabilized on-site vards. 10 and tested until confirmed to be non-hazardous. 11 Post confirmatory sampling of the excavation floor and side walls will be conducted. 12 And 13 restoration of the site will include backfill, regrading and seeding of the area. 14

The third alternative for the site is the excavation and off-site disposal of surface soil. Alternative 3 achieves Unrestricted Residential Land Use.

Similar to Alternative 2, the other
materials in the incinerator will be removed -will require waste characterization. The preexcavation delineation sampling will be
required. Contaminated soil will be treated as
hazardous waste. And post confirmatory sampling
and excavation floor and side wall sampling will

be required; in addition to restoration, which
 would include backfill, regrading and seeding.

The three alternatives established for the Former Incinerator Area were compared against one another using the same criteria as previously discussed.

7 The Threshold Criteria, which is the
8 protectiveness of human health and the
9 environment, also eliminated Alternative 1, which
10 was no action.

11 The compliance with the ARARs -- again, as 12 a reminder, this is the assessment of the 13 alternative, compliance with federal or local 14 laws and standards.

We looked at the Balancing Criteria, the long-term -- which includes the long-term effectiveness; reduction of toxicity, mobility and volume through treatment; the short-term effectiveness; the implementability and the estimated costs.

Finally, we will look at the Modifying Criteria, which will be formally evaluated as part of the Record of Decision after the public has had an opportunity to comment on the Proposed Plans. And this will include the state and the 1 community acceptances.

For the Atlas Scrap Yard Former Incinerator Area, the preferred alternative is Alternative 2, which is the excavation, stabilization and off-site disposal of surface soil.

6 This alternative will attain the 7 Unrestricted Residential Land Use. It is a green 8 and highly sustainable alternative. It reduces 9 the mobility of the contamination that will be 10 disposed of in an off-site facility.

11 Technically and administratively feasible as 12 excavation and stabilization agents are common 13 and successful in treating lead-contaminated 14 soils. There is long-term effectiveness, and 15 this is highly effective as contamination will be 16 removed from the site.

The estimated cost for Alternative 2 is 235,655 -- I am sorry -- \$235,655, which is less than the estimated cost of implementing Alternative 3, which is \$372,578.

The second site at Atlas Scrap Yard that requires remediation is the Former Storage Area. This is located in the north-central section of Atlas Scrap Yard. It is a slightly larger area that is comprised of approximately 14.9 acres.
In 19 -- after the Vietnam War in 1975, the site was used as a stockpile storage area for bulk materials including gravel, railroad ballasts, sand, culvert pipes, railroad ties and telephone poles.

6 In 2017, removal of the railroad ties, 7 timber, concrete and asphalt occurred. During 8 this, 1,160 tons of rail ties and telephone 9 poles; 1,655 tons of concrete and asphalt were 10 removed from the site. The waste was 11 characterized and determined to be non-hazardous 12 and was disposed of off-site.

You can refer to Figure 5 of your handoutsfor additional details for this area.

15 The Remedial Investigation for the Former 16 Storage Area concluded that PAHs detected at 17 numerous sample locations at concentrations 18 exceeding the 2017 USEPA Residential Soil 19 Regional Screening Levels, which will be referred 20 to as RSLs.

You can refer to Figure 7 to see the 2004/ 22 2005 and 2010 PAH sample results. And you can 23 refer to Figure 8 to see the 2011 PAH sampling 24 results.

In general, a large majority of the

25

exceedances for Atlas Scrap Yard were within the
 Former Storage Area.

3 Three locations outside of the Former 4 Storage Area exceeded benzo(a)pyrene, which is a 5 PAH, the USEPA RSLs. However, remedial action is 6 not required to be protective of the Resident 7 Receptor based on the following weight-ofevidence: For sample location ASYss-69M, four of 8 9 the five PAHs detected were below the RSLs. Benzo(a)pyrene had a maximum concentration of 1.7 10 11 milligrams per kilogram, which was just --12 slightly exceeded the RSL of 1.1 milligrams per 13 kilogram.

14 Surface soil at boring ASYsb-59, which is 15 located within the ISM sample location, was below 16 soil resident RSLs. Subsurface soil was non-17 detect for PAHs. ISM location was -- the ISM 18 location was taken within a larger ISM area, 19 which was ASYss-91M, where PAH concentrations in 20 surface soil were below the RSLs.

The second location, which is ASY-71M, also had four of the five PAHs detected below the RSLs. A large portion of the sample area was located within the southern access road, which may have contributed to the elevated 1 benzo(a)pyrene results observed in the sample.

ISM location was selected within a
larger ISM, also ASYss-96M, where PAH
concentrations in surface soil were below
the RSLs.

6 The third and final location was ASYss-101M; 7 four of the five PAHs were detected below the 8 RSLs. The maximum benzo(a)pyrene concentration 9 was 1.4 milligrams per kilogram, which again 10 is just slightly above the 1.1 milligram per 11 kilogram RSL.

And the sample location likely had contributions to elevated benzo(a)pyrene, because they were adjacent to the Paris-Windham Road and within the southern access road to Atlas Scrap Yard.

This figure presents to you the data and the information, in Figure 7 of the handout, for the -- for the Former Storage Area, sample results from 2004 and '05 and '10.

21 And then Figure 8, as I mentioned, already 22 has the 2011 PAH results.

23 Remedial Investigation conclusions for the 24 Former Storage Area were that remediation is 25 required to be protective of the Industrial 1 Receptor at location ASY-126M.

If you refer to Figure 9 of your handouts, you can see that small orange area. That is the area -- or that is the location that we are talking about.

The benzo(a)pyrene concentration was 50 milligrams per kilogram, which was -- which is above the cleanup goal, which is established as 21 milligrams per kilogram.

10 Remediation is required for the entire 11 Former Storage Area to attain an Unrestricted 12 Land Use. And you can refer to Table -- to 13 Figure 10 for that.

So this -- the thin area right here is the area that would need to be remediated to attain the Commercial/Industrial Land Use.

17 And this entire area here is the area 18 that would need to be remediated to meet the 19 Unrestricted Residential Land Use.

Based on the conclusions of the RI, the final Remedial Action Objectives were established for the Former Storage Area. And that is to prevent the Resident Receptor exposure to the following PAHs in surface soil from 0-1 feet below ground surface, above the cleanup goals for 1 the Former Storage Area.

The following remedial alternatives were developed for consideration: Alternative 1, a no action alternative. Alternative 2 included the excavation and off-site disposal of the surface soil at ASY-126M, which was the smaller section of land.

8 This would achieve the Commercial/Industrial 9 Land Use. The estimated excavation is 316 cubic 10 yards. Post confirmatory sampling of excavation 11 floors and side walls will be conducted. 12 Restoration would include backfilling, regrading 13 and seeding of the site.

14 Under Alternative 2, PAH COCs would remain 15 on the site above the residential cleanup goals. 16 Land Use Controls would be in place to restrict 17 Residential Receptor exposure. And five-year 18 reviews to assess the effectiveness of the Land 19 Use Controls would be implemented.

Alternative 3 is the Ex Situ Thermal Treatment of surface soil at that same location, ASY-126M. This would achieve the Commercial/ Industrial Land Use. A total estimated volume requiring treatment under this alternative would be 473 cubic yards. We would excavate contaminated soil and feed it into a treatment system. The post treated soil sampling and excavation floor and wall confirmation sampling would be completed. And site restoration would include backfilling with the treated soil, grading and seeding the site.

8 Under Alternative 3, PAHs would remain on 9 the site above the residential cleanup goals. 10 The Land Use Controls to restrict Residential 11 Receptor exposure would be in place. And the 12 five-year review to assess the effectiveness of 13 the Land Use Controls would be implemented.

14 Alternative 4 includes the excavation and 15 off-site disposal of surface soil for the Former Storage Area. This alternative would achieve the 16 Residential Unrestricted Land Use. The estimated 17 18 excavation would be 20,336 cubic yards of soil 19 removed. Post confirmation sampling and 20 excavation floor sampling and side wall sampling 21 would be completed. And the restoration would be 2.2 backfilling the area, regrading and seeding.

The final alternative is Alternative 5. This includes the Ex Situ Thermal Treatment of surface soil within the entire Former Storage Area. This would achieve the Residential Unrestricted Land Use. The total estimated volume requiring treatment will be 30,505 cubic yards of soil.

5 The excavated contaminated soil would be fed 6 into a treatment system. Post treatment soil 7 sampling and excavation floor and wall 8 confirmation sampling will be completed. And the 9 site would be restored by backfilling the area 10 with the treated soil, grading and seeding.

Similar to the previous sites that we have discussed, the five alternatives were compared against the same criteria below: The Threshold Criteria, which is the protectiveness of human health and the environment. Again, that automatically eliminated Alternative 1, which is no action.

18 The second Threshold Criteria is the 19 compliance with the ARARs, which is the 20 assessment to local law and federal laws and 21 standards.

The Balancing Criteria were long-term effectiveness; reduction of toxicity, mobility or volume through treatment; short-term effectiveness; implementability; and a cost 1 evaluation were completed.

2 As with the other two sites, the Modifying 3 Criteria will be formally evaluated as part of the Record of Decision, and after the public has 4 5 had the opportunity to comment on the Proposed 6 Plans. This would include the state acceptance 7 and the community acceptance criteria.

8 Based on the evaluation of the alternatives 9 for the Former Storage Area at Atlas Scrap Yard, 10 the preferred alternative is Alternative 3, which 11 is Ex Situ Thermal Treatment of surface soil at 12 ASY-126M.

13 This will attain the Commercial and Industrial Land Use. It is effective long-term 14 15 treatment by removing benzo(a)pyrene in the 16 surface soil. It is a green and highly sustainable alternative for on-site treatment and 17 18 reuse of soil. It reduces toxicity, mobility and volume of contaminants in soil. 19

20 The estimated cost for Alternative 2 is 21 \$224,194, which includes the estimated cost for Land Use Controls, which is \$97,978. 22

23 In the event that a thermal treatment system 24 is not available, Alternative 2, which is the 25 excavation and off-site disposal of surface soil,

at the same location, would be readily
 available.

I have included an example of a thermal treatment system that could be used at the site. If you look up -- sorry. I have my pointer going the wrong way -- at the photograph at the top, soil can be loaded onto this conveyor belt and into the treatment system.

9 The contaminated soil would be exposed 10 to high temperatures in what is called the 11 "Renewal Chamber." During this process, soil 12 contaminants, for example, PAHs, are heated up 13 and desorbed from the soil and turned into 14 vapors. The vapors are then passed through 15 filters and are captured in the treatment.

16 The treated soil is then stockpiled for 17 confirmation testing. If the soil is confirmed 18 to be below the cleanup goals, the soil is then 19 placed back into the original excavation.

20 Under our preferred alternative, the area 21 requiring the Land Use Control is denoted by the 22 blue hashes in your Figure 11 of your handouts.

Your comments and input are appreciated.
Public participation is an important component
of a remedy selection. The Army is soliciting

input from the community as part of the public
 participation responsibilities under Section
 117(a) of CERCLA.

The public comment period for the two proposed plans that I have just presented is August 17th to September 16, 2020.

7 You can provide written or verbal comments 8 at this public meeting, or you can submit written 9 comments by September 16, 2020, to the following 10 address; which is the Camp James A. Garfield 11 Environmental Office, to Katie Tait's attention. 12 That concludes my presentation. Are there 13 any questions? 14 And I will leave this address up here, in 15 case anyone needs to write that down. 16 MS. COLDWELL: If there are any 17 questions at this time, we can take them now. 18 MS. LOCK: Hi. I do have a 19 On the slide number -question. 20 THE REPORTER: I am sorry. Could

21 you please speak up so I can hear?

22 MS. ADAMS: Yes. Do you mind 23 stating your name for the record? 24 MS. LOCK: Oh, Sarah Lock.

THE REPORTER: I am sorry?

25

39 1 MS. LOCK: Sarah Lock, 2 L-o-c-k. 3 THE REPORTER: I am sorry. 4 On the slide --MS. LOCK: 5 MS. ADAMS: I am sorry. Did you say "Block," B-l-o --6 7 MS. LOCK: Lock, L-o-c-k. 8 MS. ADAMS: Did you get it? 9 **THE REPORTER:** Okay. Thank you. 10 MS. ADAMS: L-o-c-k. Okay. 11 Sorry, Sarah. 12 MS. LOCK: On Slide 49, which is the Atlas Scrap Yard for Alternative --13 14 Alternative 3. It says this is the estimated cost for Alternative 2. So what is the cost for 15 Alternative 3? 16 17 MS. ADAMS: We have that in 18 our report here. Just give us one second. We will look that up for you. I don't know those 19 20 numbers off the -- by heart. 21 MS. LOCK: Or is that 2.2 Alternative 3? 23 Yes, that is for MR. THOMAS: 24 Alternative 3. That is a typo. So it should 25 say the estimated cost for Alternative 3 is

\$224,000. MS. LOCK: Okay. Thank you. That is it. MS. COLDWELL: Are there any other questions? Okay. Well, thank you so much for being here tonight. And if there -- you have the information if you want to submit comments by the due date. Thank you. MS. ADAMS: Thank you everyone. (Thereupon, the public meeting was concluded at 6:23 p.m.)

41 1 CERTIFICATE 2 3 STATE OF OHIO,) SS:) 4 SUMMIT COUNTY,) 5 I, Jerri Lynn Wheat, a Stenographic 6 Reporter and Notary Public within and for the State of Ohio, duly commissioned and qualified, 7 do hereby certify that these proceedings were taken by me and reduced to Stenotypy, afterwards prepared and produced by means of Computer-Aided 8 Transcription and that the foregoing is a true 9 and correct transcription of the proceedings so taken as aforesaid. 10 I do further certify that these proceedings 11 were taken at the time and place in the foregoing caption specified, and were completed without 12 adjournment. 13 I do further certify that I am not a relative, employee of or attorney for any party or counsel, or otherwise financially interested 14 in this action. 15 I do further certify that I am not, nor is 16 the court reporting firm with which I am affiliated, under a contract as defined in Civil 17 Rule 28(D). 18 IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Akron, 19 Ohio, on this 3rd day of September, 2020. 20 21 Jerri Lynn Wheat, Stenographic 22 Reporter and Notary Public in and for the State of Ohio. 23 24 My commission expires April 8, 2023. 25

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Photographs

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WRITTEN PUBLIC COMMENTS

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No written comments were received during the public notification period.

Oral comments were provided during the public meeting. The comments and the Army's responses are provided in the public meeting transcript and the site-specific Records of Decision. THIS PAGE INTENTIONALLY LEFT BLANK.