



State of Ohio Environmental Protection Agency

FILE COPY

SR

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September 28, 2010

Mr. Peter Forbes  
AFRPA, Department of the Air Force  
154 Development Drive, Suite G  
Limestone, ME 04751-6122

**Re: Rickenbacker ANGB, IRP Site 1  
TSDF (post-closure) OH3571924544 Franklin County  
Annual Ground Ground Water Report for 2009, and Semi-annual Corrective Action  
Effectiveness monitoring reports (January-June 2009, July-December 2009)**

Dear Mr. Forbes:

Ohio EPA has received and reviewed the July 29, 2010 submittal from the Air Force pertaining to the June 22, 2010 Notice of Violation. The Ohio EPA Central District's Division of Hazardous Waste Management (DHWM) and Division of Drinking and Ground Waters (DDAGW) have reviewed this information for compliance with the 2008 Amended Post-Closure Plan for this site, and with Ohio Administrative Code (OAC) 3745-54 and 3745-55, and the reporting requirements of OAC Rule 3745-54-100(G).

At this time, the violation noted in the June 22, 2010 letter still remains unresolved:

**Modification of Post-Closure Plan- OAC Rule 3745-54-100(H):** The Owner or Operator must submit an application to modify the plan within 90 days of determining that the corrective action program no longer satisfies the requirements of this rule.

Two problems with the monitoring well network may cause it to be unrepresentative and/or insufficient to evaluate the extent of contamination. Wells MW-212S and 212D are believed to be unrepresentative; and concentrations of COCs at MW213S are not being sufficiently monitored north of that point. The Air Force intends to investigate the subsurface area with a series of borings, in order to evaluate potential options for other corrective action measures and to determine optimal locations for new/replacement wells to address the above concerns.

The Air Force has issued a contract for the above work to be completed by 9/30/2011, according to a September 16, 2011 conference call with Parsons and the Air Force.

*Until an amendment to the post-closure plan that effectively addresses these concerns is received, this compliance issue will remain unresolved.*

In the meantime until the plan amendment is accomplished, Ohio EPA requests to be kept updated with copy(ies) of the work schedule for the project(s) being undertaken at Site 1 to address these concerns. The investigatory studies of the subsurface via borings (which we understand may occur this winter, for which an amendment of the post-closure plan would not be required). The subsequent installation of monitoring wells would need to be done under an approved amendment of the post-closure plan. Receipt of these schedules will help to demonstrate good faith progress toward the return to compliance.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

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Ohio EPA is interested in fostering environmentally beneficial options currently being explored by the Air Force which could accelerate the clean up the remaining contamination at Site 1. Successful efforts in this regard could potentially shorten the post-closure care and monitoring period for the ground water. Remedy selection(s) according to OAC Rule 3745-54-100(H) would hinge on the data obtained from the characterization of soil and/or ground water which you are intending to do.

As you consider the post-closure plan amendment and replacement well construction plans, please be advised that any locations where two separate aquifer layers are present, would need to have wells constructed by auger and seal methods rather than pre-pack direct push, in order to meet Ohio technical standards.

The post-closure plan modification should detail the number and location of additional wells and any changes to the monitored parameters at each well location. Schedules should be included for all anticipated activities that have not been conducted prior to submitting the modification. As examples, the modification should include schedules for monitoring well installation (as necessary), reporting of subsurface investigation work and results, development and implementation of a remedial plan, and remedial effectiveness reporting to Ohio EPA.

Ohio EPA looks forward to receiving the information outlined above from the Air Force describing actions taken to return to compliance in the near future. Should you have any questions, please feel free to call me at (614) 728-3885. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>.

Sincerely,



J. David Hohmann  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

c: Jason Bidgood, Parsons  
Tom Smith, US EPA  
Jason Reed, DDAGW  
CDO File

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"Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from having to comply with all applicable regulations."