



State of Ohio Environmental Protection Agency

FILE COPY

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Central District Office

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P.O. Box 1049
Columbus, OH 43216-1049

May 4, 2009

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**

Dear Mr. Forbes:

Ohio EPA conducted a routine hazardous waste compliance inspection on April 21, 2009, at the Rickenbacker ANGB, IRP Site 1 in Columbus, Ohio. Parsons, the Air Force's contractor for operation and maintenance at the site, was doing groundwater sampling and well inspection activities. We evaluated the compliance with Ohio's hazardous waste laws and regulations under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code. The approved Post-Closure Plan for RANGB Site 1 [referenced per OAC Rule 3745-66-17(D)], further specifies your site-specific requirements for post-closure care.

One violation was noted:

1. **Site Inspection and Maintenance Activities— Post-Closure Plan Section 8.4:** "Concurrently with the semi-annual sampling activities... Regular maintenance and, if necessary, repair activities will be completed. Wells will be checked for damaged protective casings, covers, caps or locks. If damage is noted, the damaged items will be immediately repaired, or as soon as practicable if the utilization of a subcontractor is required to repair the item(s). In addition, the Ohio EPA Central District Office (CDO) will be notified upon discovery of damaged items. All damage and repair or maintenance actions will be noted in a field logbook and in the annual report to Ohio EPA."

The protective cover plate of Well #203-S had been damaged by an airport snowplow in the winter of 2007-2008. Repairs of this problem had not yet been completed. The Air Force was evidently negotiating with the CRAA over who would pay for this work. Meanwhile the well was covered by a flat steel plate that allowed standing water to fill the vault area above the top of the well cap, which could threaten the integrity of the well seal especially during wintertime freeze/thaw periods. Ohio EPA is unaware of being previously informed of the existence or discovery of this damage.

Please promptly provide the necessary repairs and records confirming they have been completed, including any necessary repairs to the concrete well seal.

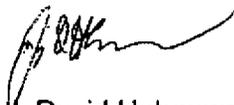
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

In addition to the above-noted violation, the following comments are provided:

- No other problems were noted with the sampling operations or other maintenance activities associated with the wells at the IRP Site 1. The new well cluster 212-S and 212-D appeared to have been constructed using good quality methods. Possible reasons for apparent mounding of ground water at that particular location (vs. the other wells to the north beneath the concrete apron area) should be considered and evaluated.
- The cooperation and assistance of the Parsons field sampling staff (Cheryl Huey and Matt Pesci) during the inspection visit was appreciated.

A reply from the Air Force describing actions taken to return to compliance is requested within 30 days of your receipt of this letter. 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,



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

c: Jason Bidgood, Parsons
Tom Smith, US EPA
Kristina Durnell
Mike Bondoc, 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."