



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

FILE COPY

May 17, 2011

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 Water Report for 2010 and Semi-annual Corrective Action Effectiveness  
Report for Second Half of 2010 dated February 2011.  
Notice of Violation**

Dear Mr. Forbes:

Ohio EPA has received and reviewed submittals from the Air Force pertaining to its monitoring of ground water and ground water corrective action effectiveness at the Former Rickenbacker ANGB, IRP Site 1 during 2010. The Ohio EPA Division of Environmental Response and Revitalization (DERR) has reviewed this information for compliance with the 2008 Amended Post-Closure Plan for this site, Ohio Administrative Code (OAC) 3745-54 and 3745-55, and the reporting requirements in OAC Rule 3745-54-100(G).

The following violations were identified during this review.

- 1. OAC 3745-54-100(D) Ground Water Monitoring Effectiveness:** This rule requires the owner or operator to establish and implement a ground water monitoring program to demonstrate the effectiveness of the corrective action program. The corrective action monitoring program does not include wells north of MW- 213S or south of MW203S to demonstrate the full extent of contamination. MW-212 S and MW-212D may not be representative because of a leaking sewer pipe. To return to compliance, the post-closure plan should be modified to detail the plans to return the corrective action monitoring program to compliance with the requirements of OAC 3745-54-100(D), including the number and locations of proposed additional monitoring wells, a schedule for implementation of the plan, a schedule for evaluation of the results, and a schedule for reporting to Ohio EPA.
- 2. OAC Rule 3745-54-100(H) Modification of Post-Closure Plan:** This rule requires the owner or operator to 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. The Air Force was cited for this violation twice previously on June 22, 2010 and on September 28, 2010. Several of the Air Force's October 9, 2009 responses to comments indicate that an application for modification of the post-closure plan will be requested after information regarding the risk posed by the chlorinated aliphatic hydrocarbon (CAH) plume is obtained and evaluated. However, this approach is not consistent with the requirements of OAC 3745-54-100(H), which requires the owner or operator to request a modification of the post-closure plan within 90 days of the determination that the monitoring network no longer meets the requirements of the rule.

Mr. Peter Forbes  
Department of the Air Force  
May 11, 2011  
Page 2

Several other comments were generated during this review and are presented here:

1. The evidence provided by the statistically significant increasing trends in concentrations of COCs in MW-206S and MW-206D indicates that additional remedial actions will be necessary. The Air Force is proposing additional investigation to determine the most appropriate remedial approach for the site. The anticipated schedule for the steps of the planned investigation and its deliverables should be provided in the post-closure plan modification to address the requirements of OAC 3745-54-100(H) and to return to compliance.
2. Inaccurate references to compliance with the requirements of OAC 3745-65 for ground water monitoring and reporting persist throughout the annual and semiannual reports. As specified in the approved post-closure plan, the Air Force's ground water program is subject to the standards in OAC 3745-54 and the site is currently in corrective action pursuant to the requirements of OAC 3745-54-100. All inaccurate references to the ground water program complying with ground water monitoring and reporting requirements under OAC 3745-65 should be omitted from future reports.

A response from the Air Force describing the 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) 728-5036. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>. This will change in the near future because the cleanup aspects of the former Division of Hazardous Waste Management have been assigned to DERR.

Sincerely,



Chris Bulinski  
Environmental Specialist  
Division of Environmental Response and Revitalization  
Central District Office

c: Jason Bidgood, Parsons  
Todd Anderson, Legal  
CDO DERR File

ec: Ed Lim, DERR, CO  
Deborah Strayton, DERR, CDO  
Diana Bynum, DERR, CDO  
Jason Reed, DDAGW  
Steve Rath, CDO, DMWM

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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."