



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

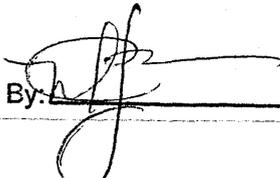
TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

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

CERTIFIED MAIL #

September 9, 2008

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: 

Date: 9-9-08

Mr. Peter W. Forbes
Department of the Air Force
Air Force Real Property Agency (AFRPA)
154 Development Drive, Suite G
Limestone, ME 04750-6122

**Re: Amended Post-Closure Plan Approval
Newark AF Base (Former Fac. 87)
OH3 570024650**

Dear Mr. Forbes:

On April 24, 2008, the Air Force Real Property Agency submitted to Ohio EPA a Draft Work Plan for Source Removal at the Newark Air Force Base, Former Facility 87, (former interim status permitted container storage area, closed as a landfill in 1996) located at 813 Irving Wick Drive, Heath, Ohio. Additional draft revisions to the amended post-closure plan for this facility were received on June 11, July 24, August 15, August 21, and August 26, 2008, including a related work plan for additional source removal excavation that is intended at the site. The amended post-closure plan was submitted pursuant to rule 3745-66-18 of the Ohio Administrative Code (OAC) in order to demonstrate that the Air Force's post-closure activities comply with OAC rule 3745-66-18 and the ground water monitoring and response requirements of OAC Chapter 3745-54.

The owner or operator and the public were given the opportunity to submit written comments regarding the amended post-closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of the Air Force's submittal and subsequent revisions, I conclude that the amended post-closure plan for the hazardous waste facility at 813 Irving Wick Drive, Heath, Ohio, as modified herein, complies with the pertinent parts of OAC rule 3745-66-18.

The amended post-closure plan submitted to Ohio EPA on April 24, and revised on June 11, July 24, August 15, August 21, and August 26, 2008, by the Air Force is hereby approved with the following modifications (attached).

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

OHIO E.P.A.
SEP - 9 2008
AMENDED DIRECTOR'S JOURNAL

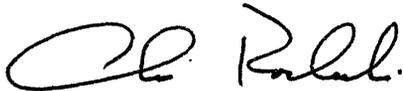
Compliance with the approved post-closure plan, especially including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved closure plan. Please be advised that approval of this amended post-closure plan does not release the Air Force from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

When the post-closure care period is completed, OAC rule 3745-66-20 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the post-closure care was performed in accordance with the approved post-closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Information Technologies and Technical Support Section, P.O. Box 1049, Columbus, OH 43216-1049.

Sincerely,



Chris Korleski
Director

c: Ed Lim, Manager, ERAS, DHWM/CO
Tom Smith, EPA, Region 5
Dale Meyer, EPA, Region 5
David Hohmann, DHWM/CDO
Jason Bidgood, Parsons

Modifications:

The "Validated Data Report for the Source Removal Effort at Former Facility 87" (Parsons, 2008a), shall be incorporated into this post-closure plan as **Appendix J-1**. Likewise, the Air Force's "Final Work Plan- Part B, Former Newark Air Force Base" shall be incorporated into the post-closure plan as **Appendix J-2**.

Ohio EPA's approval of the plan is focused on the ongoing post-closure care obligations that are described therein. It does not imply an explicit concurrence that specific remedial goals will be reached when the plan is implemented. The Air Force's site characterization data from 2007 were only validated by the Air Force and its contractors.

Well GMW-08 shall also be shaded red on Figure 3.3 of the Part B Work Plan and Figure 3-1 of the post closure plan. An updated ground water monitoring well network shall be constructed and operated as described in the post-closure plan. Eleven of the earlier monitoring wells and nine other wells from previous substrate injection and soil vapor monitoring that are located within the footprint of the supplemental soil excavation, shall be properly abandoned and removed as described in the Part B Work Plan Section 3.2.3 (Post Closure Plan Appendix J-2). In addition, well GMW-08 shall be similarly abandoned at this time by pressure grouting in place, and removed from the ongoing monitoring network.

Following completion of the related new well construction, the Air Force shall submit a new Figure 3-1 for the Post-Closure Plan showing just the wells that are being monitored and their actual surveyed locations. At that time, the Air Force shall also submit and add to the Post Closure Plan Appendix C, the new monitoring well construction and boring logs.

Source Removal Workplan (Appendix J-2) shall be modified as follows:

Section 3.2.5 shall include this paragraph:

Soils removed from above the water table in apparent "hot spot" areas will be segregated upon being excavated. Those particular hot spot areas of unsaturated soils have a high potential to exceed regulatory limits for disposal as hazardous waste for TCLP (D038), and would include: approximately a 10-foot radius around the location of SB-11 starting below a depth of 8 feet; approximately a 7 foot radius around the location of SB-10 from 0 to 8 feet below grade; approximately a 15-foot radius around the location of SB-15 beginning at the surface; and approximately a 5 foot radius around the location of SB-17 below a depth of 8 feet. Note that some of these presumed "hot spot" soil volumes may overlap or intersect.

Section 3.2.9 shall include the following paragraphs:

Soils excavated from defined "hot spot" areas will be separately characterized upon generation and managed appropriately as long as there is some belief that they may be hazardous waste. They will be managed during this time in one of two ways:

- a.) in containers such as covered roll-off boxes or,
- b.) in staging pile(s) consistent with requirements set forth under OAC Rule 3745-57-74.

Evaluation of these soils shall be performed by the generator in accordance with OAC Rule 3745-52-11 for determination of the appropriate disposal options for these soils.

The location and design of the staging pile(s) shall be shown in drawings attached to this workplan, by a registered professional engineer. The staging pile will be located in the excavation footprint area north of former building 114. Approximately 8 feet of clean overburden soils will be removed and stored elsewhere on site in a clean stockpile. The Staging Pile will then be prepared in this excavated hole with appropriate liner, cover, and run-on/run-off controls.

Such location shall be subject to OAC Rule 3745-57-74(J) when closed, and which requirements shall be met through the completion of the planned source removal excavation project.

Final clean copies of the changed pages (including updated table of contents) of the Post-Closure Plan and modified pages of the *Source Removal Workplan* (Appendix J-2), shall be provided to Ohio EPA and to each of the official custodians of copies of the Post Closure Plan, within 14 days of receipt of this approval.

A current copy of the approved Post-Closure Plan shall be kept available for review and reference at the FF-87 site during the time that the source removal work is being performed.

PUBLIC NOTICE

Licking County

**OHIO EPA APPROVES CLOSURE PLAN FOR
NEWARK AIR FORCE BASE**

On September 9, 2008, Ohio EPA approved an amended post-closure plan for the Newark Air Force Base (Former Facility 87) for its container storage area located at 813 Irving Wick Drive, Heath, Ohio. The EPA I.D. number for this facility is OH3570024650.

Pursuant to Ohio Revised Code rule 3745-66-18 the facility's closure plan submitted on April 24, and revised on June 11, July 24, August 15, and August 26, 2008, was approved with modifications as outlined in the Director's September 9, 2008. This final action was not preceded by a proposed action and is appealable to the Environmental Review Appeals Commission.