



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

OHIO E.P.A.

OCT 29 2014

ATTACHED DIRECTOR'S JOURNAL

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: Jeff Cassler Date: 10-29-14

OCT 29 2014

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

Re: **Rickenbacker ANGB Building 560  
Director's Authorization  
Approval  
RCRA C - Hazardous Waste  
Franklin County  
OH3571924544**

**Subject: Amended Post Closure Plan Approval with Modifications  
Rickenbacker Air National Guard Base, IRP Site 1, Former Building  
# 560 and vicinity  
125000685-106**

Dear Mr. Forbes:

On June 09, 2014, the Department of the Air Force submitted to the Ohio Environmental Protection Agency (EPA) an amended post-closure plan for the Installation Restoration Program (IRP) Site 1 (former Building # 560 and vicinity) located at the former Rickenbacker Air National Guard Base (ANGB) in Columbus, Ohio. The amended post-closure plan was submitted to demonstrate that the Air Force's proposed post-closure activities comply with the requirements of Ohio Administrative Code (OAC) rule 3745-66-18. Ohio EPA received revisions to the amended post-closure plan on September 05, 2014.

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 Department of Air Force submittal and subsequent revisions, I conclude that the amended post closure plan for the hazardous waste facility at the former Rickenbacker ANGB as modified herein meets the performance standard contained in OAC 3745-66-11 and complies with the pertinent parts of OAC rule 3745-66-18.

The amended post-closure plan submitted to Ohio EPA by the Air Force on June 09, 2014 and revised on September 05, 2014 is hereby approved with the following modifications:

**1. Remedial effectiveness monitoring must be conducted at all monitoring wells listed in Table 3-1 per OAC 3745-54-100(D).**

Section 3.5 “Remedial Effectiveness Monitoring during ISCO Implementation” paragraph 4, must be revised to state that remedial effectiveness monitoring will continue semi-annually at all monitoring wells listed in Table 3-1, not only the ten compliance wells referenced at the beginning of the paragraph.

**2. Table 3-9 must be modified as discussed below.**

**a. Remove “Current Analytical Parameters” column.**

The column is not necessary for ongoing remedial effectiveness monitoring and subsequent post-remedial verification monitoring at the site.

**b. Remove “Proposed” from “Proposed Analytical Parameters”.**

The analytical parameters listed in this column are required for ongoing remedial effectiveness monitoring and subsequent post-remedial verification monitoring at the site and are no longer proposed.

**c. Remove the “Analysis Justification” column.**

This column is not necessary for ongoing remedial effectiveness monitoring and subsequent post-remedial verification monitoring at the site.

**3. Remove Table 3-8 “ISCO Implementation Monitoring Well Network”.**

Table 3-8 is not necessary for ongoing remedial effectiveness monitoring and subsequent post-remedial verification monitoring at the site. All references to Table 3-8 in the text must also be deleted.

**4. Revise Section 3.3.2.1 “Excavation Conceptual Design” to reference Section 3.4.1 concerning collection of confirmatory samples.**

Reference Section 3.4.1 in the fourth paragraph of Section 3.3.2.1 for the collection of confirmatory samples rather than Section 4.1.

**5. Revise the first paragraph of Section 1.1.2 “Closure Plan Objective” to state the “This tenth revision...”.**

The first paragraph, fifth sentence, of Section 1.1.2 should state “This tenth revision of the AC/PCP...”.

Two clean copies of the revised amended post closure plan must be sent to:

Mr. Chris Bulinski  
Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
Central District Office  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Compliance with the approved post-closure plan is expected. Ohio EPA will monitor such compliance and reserves the right to take action, pursuant to Ohio Revised Code (ORC) chapters 3734 and 6111, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions of this approved post closure plan. Approval of this 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.

This action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. 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 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer," 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 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:

Environmental Review Appeals Commission  
77 South High Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215

When the post-closure care period is completed, OAC rule 3745-66-20 requires the facility owner or operator to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has completed post-closure care 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). The certification should be submitted to:

Mr. Edwin Lim, Manager  
Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
Engineering Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

A copy should be sent to:

Mr. Chris Bulinski  
Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
Central District Office  
P.O. Box 1049  
Columbus, Ohio 43216-1049

If you have questions about implementing this post-closure plan, contact Mr. Chris Bulinski at 614-728-5036.

Sincerely,



Craig W. Butler  
Director

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