Read Ahead for:

Uniform Federal Policy
for
Quality Assurance Project Plans
Training Course

Old Defense Rail Yard (ODRY)

During the course, please be prepared to discuss the following:

- What are the physical boundaries, including depth, of the project?
- What matrices may be affected (soil, water, air, waste debris)?
- Are bulk hazardous wastes present (transformers, barrels, etc.)?
- What are the analytes of concern and are there any analytes of interest (other contaminants that could potentially be present)?
- What are the risks associated with the site?
- If you were developing a site conceptual model, what would you propose as the source, pathways, and receptors of concern?
- What is the decision required for this project?
- What data quality indicators are needed for assessing the data?
- What is required to ensure the data is useable for making the decision?

Site Overview

There has been no DOD-related activity at the site for the last 10 years. The future use for the site is an industrial complex for light manufacturing. The City of Liquid, Ohio plans to buy the site after the US EPA and Ohio Remediation for Defense Sites (ORDS) accepts the site as clean for the intended use by the city. Figure 1 is a map for the entire site. Figure 2 presents a map of the project-specific area (i.e., the grit blast area around Building 3220 and the railcar repair area of Building 2720).

(Classroom Note: A generic QAPP may be developed for this site since multiple activities are probable within this site. Reference may then be made to the more complete information on the other operable units within the geographical area of the site to be turned over to the City. These other areas are not presented in this project specific QAPP. This project is limited to only the activities identified for Building 3220.)

Site Description, History & Background

The Old Defense Rail Yard was operated by the Department of Defense since 1910 as a transfer and storage facility for military supplies and support materials. The site includes buildings and equipment associated with operating a rail system and storage of military supply operations. The site was removed from active military operations in 1985. In the final years of operation, the Defense Logistics Agency (DLA) operated the site and was responsible for past activities. Since the closure of the site, DLA has proceeded with various cleanup and remediation activities to close the site and provide the property to the City of Liquid, Ohio. Based on past use and earlier DLA, EPA, State and local decisions, the site is to be designated for light industrial manufacturing. The City of Liquid does not have the technical expertise for this type of undertaking, so it has delegated the decision on the site clean-up to the US EPA and State of Ohio, Department of Environmental Management (ODEM), Remediation of Defense Sites (ORDS).

Building 3220

The unit area to be closed is Building 3220 and its surrounding railway areas. Building 3220 is an unenclosed building (i.e., shed) used for railroad car painting. The structure was constructed in 1985 and it was linked to the main tracks with rails at the same time (the rails and structure are not found in aerial photos from 1945 and 1975). The structure consists of several small metal poles that straddle a single set of rails. The structure has a tin roof, approximately 12 feet high. The area is located near Building 2720, which is known as Railroad Car Repair. Both buildings are located in the central portion of Old Defense Rail Yard (ODRY) just off of Highway 479, which is located in Sudor Township, SE, l/4 portion of Section 27, Bluejay County, Liquid, Ohio.

On November 1, 1989 a contract was put in place to remove old paint and repaint 50 boxcars. Grit blasting of the boxcars was stopped on December 10, 1991 due to cold weather. At this point sandblasting of 40 of the contracted 50 boxcars was complete. During operations, the shed (i.e., Building 3220) did not prove to be sufficient for containment of the waste materials. Waste materials were deposited on the ground and in the rocks/ballasts (gravel) covering the area. The Defense Logistics Agency (DLA) Site Environmental Protection Department (EPD) for ODRY constructed a temporary, plastic-lined containment area on-site and required the contractor to place the grit blast residue (GBR) into the containment.

The grit blasting residue (GBR) was sampled and analyzed for heavy metals. On January 15, 1992 the lab notified DLA-EPD that the waste material generated by the grit blasting consisted of residual grit blast material and paint chips that contained chromium and lead at regulated levels. With these results, it was determined that a non-permitted hazardous waste pile containing DO07 waste had been created. The Ohio Department of Environmental Management (ODEM), Ohio Remediation for Defense Sites (ORDS) was notified of the situation and visited the site on February 28, 1992. A 172-ton waste pile was removed in March 1992.

In July 1992 ODEM-ORDS referred this issue to the U.S. Environmental Protection Agency, Region V (U.S.EPA). In July 1995, DLA-ODRY was issued a Notice of Violation for the grit blast area requesting that a

closure plan be submitted within 180 days of the effective date of the permit (which was 14 September 1995). The closure plan was submitted to the U.S.EPA on 22 February 1996.

During the August 27-29 and the September 3, 1996 inspections, conducted by ODEM-ORDS, field notes for non-RCRA violations list that sandblast grit was observed on the ground in the vicinity of Building 3220 (in the rectangular blasting area). The contractor left the unused bags of new grit blast material on site after the operation was stopped. Over time, the bags degraded releasing new blast material onto the ground. The new material was to be disposed of when the closure plan was approved and cleanup effort began. However, the official description of violations references I. C. 13-30-2-I and 40 CFR 265.31, citing that the permittee has not maintained and operated the facility to minimize releases to the environment. Due to the discrepancy in how the material was classified, it was determined that the unused material should be disposed of prior to the approval of the closure plan.

On 20 November 1996, the unused grit blast material located near Building 3220 was placed in a lined roll-off and staged at the DLA Hazardous Waste lot and labeled as non-regulated waste awaiting sample results.

Samples were collected and sent to Good Lab Data, Inc. of Goodville, Ohio by Railway Engineering Center. The sample results show that all analytes were below quantitation limits (BQL). Since the Liquid OH Landfill has a special waste permit (permit #82345) to accept grit blast and since the analytical results were BQL, the stored unused grit blast was disposed of at the Liquid, OH landfill.

Figure 1 -- SITE PLAN (additions not to scale)

Bldg 3220 Unenclosed Railroad Car Painting Facility

Bldg 2720 Railroad Car Repair Facility

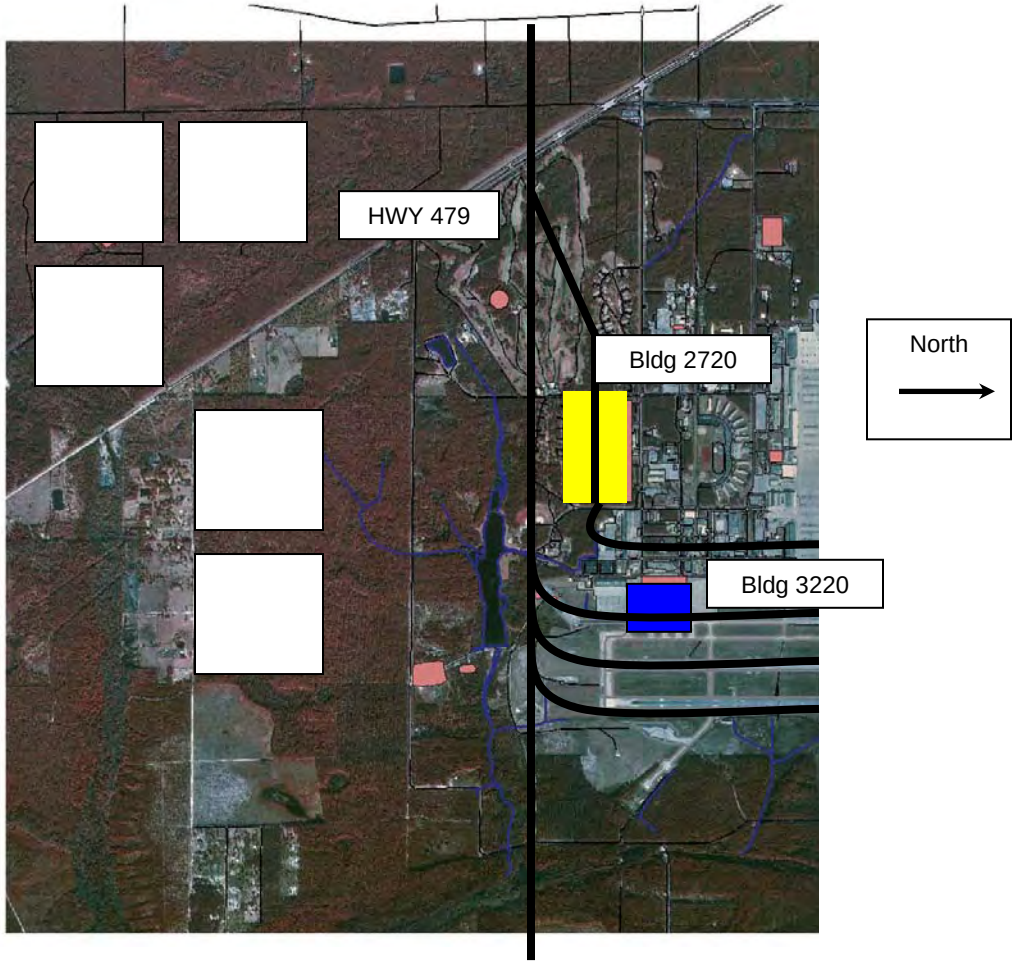

Figure 2 – BUILDINGS 3220 & 2720 (additions not to scale)

Bldg 3220 Unenclosed Railroad Car Painting Facility

(2 acre site blocked with dashed line below)

Bldg 2720 Railroad Car Repair Facility