

FY2013

LTA - MARION ENGR DEPOT EAST
Army Defense Environmental Restoration Program
Installation Action Plan

Printed 27 August 2013

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Statement of Purpose

The purpose of the Installation Action Plan (IAP) is to outline the total multiyear cleanup program for an installation. The plan identifies environmental cleanup requirements at each site or area of concern (AOC), and proposes a comprehensive, installation-wide approach, along with the costs and schedules associated with conducting investigations and taking the necessary remedial actions (RA).

In an effort to coordinate planning information between the restoration manager, the 88th Regional Support Command (RSC), the US Army Environmental Command (USAEC), the Installation Management Command-Army Reserve Office (IMCOM-ARO), the Marion Local Training Area (LTA), the executing agencies, regulatory agencies, and the public, an IAP was completed. The IAP is used to track requirements, schedules, and budgets for all major Army installation cleanup programs.

All site-specific funding and schedule information has been prepared according to projected overall Army funding levels and is, therefore, subject to change.

Acronyms

AEDB-R	Army Environmental Database -Restoration
AOC	Area of Concern
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
DD	Decision Document
EE/CA	Engineering Evaluation/Cost Analysis
ER,A	Environmental Restoration, Army
FRA	Final Remedial Action
FS	Feasibility Study
FUDS	Formerly Used Defense Sites
FY	Fiscal Year
HHRA	Human Health Risk Assessment
IAP	Installation Action Plan
IMCOM	Installation Management Command-Army Reserve Office
IMCOM-ARO	Installation Management Command-Army Reserve Office
IRA	Interim Remedial Action
IRP	Installation Restoration Program
K	thousand
LTA	Local Training Area
LTM	Long-Term Management
LUC	Land Use Control
MED	Marion Engineering Depot
N/A	Not Applicable
NFA	No Further Action
NPL	National Priorities List
NTCRA	Non-Time Critical Removal Action
OEPA	Ohio Environmental Protection Agency
PA	Preliminary Assessment
PBA	Performance-Based Acquisition
RA	Remedial Action
RA(C)	Remedial Action (Construction)
RAB	Restoration Advisory Board
RC	Response Complete
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
RIP	Remedy-in-place
ROD	Record of Decision
RRSE	Relative Risk Site Evaluation
RSC	Regional Support Command
SAV	Staff Assisted Visit
SI	Site Inspection
SVOC	Semi-Volatile Organic Compound
TAPP	Technical Assistance for Public Participation
TBD	To Be Determined
TRC	Technical Review Committee
USAEC	US Army Environmental Command

Acronyms

USEPA US Environmental Protection Agency

VOC Volatile Organic Compounds

Installation Information

Installation Locale

Installation Size (Acreage): 127

City: Marion

County: Marion

State: Ohio

Other Locale Information

The 127-acre Marion LTA is located at 2565 Harding Highway East, approximately three miles east of the city of Marion, Ohio between US Routes 23 and 30 and State Route 98 and Patten Pike Road in Claridon Township, Marion County, Ohio.

Installation Mission

The Marion LTA is used for unit training exercises; however, the training exercises were suspended until the completion of the remedial action (RA) and were reopened in 2008 in accordance with the decision document (DD).

Lead Organization

US Army Reserve

Lead Executing Agencies for Installation

USAEC

88th RSC

Regulator Participation

State Ohio Environmental Protection Agency (OEPA)

National Priorities List (NPL) Status

LTA - MARION ENGR DEPOT EAST is not on the NPL

Installation Restoration Advisory Board (RAB)/Technical Review Committee (TRC)/Technical Assistance for Public Participation (TAPP) Status

RAB established 199710

Installation Program Summaries

IRP

Primary Contaminants of Concern: Metals, Semi-volatiles (SVOC), Volatiles (VOC)

Affected Media of Concern: Soil

5-Year / Periodic Review Summary

5-Year / Periodic Review Summary

Status	Start Date	End Date	End FY
Complete	201106	201206	2012
Planned	201606	201706	2017

Last Completed 5-Year / Periodic Review Details

Associated ROD/DD Name	Sites
LTA-01 DD	LTA-01

Results The selected remedy remains protective.

Actions None

Plans None

Recommendations and Implementation Plans:

N/A

Land Use Control (LUC) Summary

LUC Title: LUCs for LTA Marion

Site(s): LTA-01

ROD/DD Title: LTA-01 DD

Location of LUC

Soil at LTA-01, 2565 Harding Hwy East of Marion, OH

Land Use Restriction: Media specific restriction - Prohibit, or otherwise manage excavation, Restrict land use - No residential use

Types of Engineering Controls: Fences

Types of Institutional Controls: Dig Permits, Restrictions on land use

Date in Place: 200805

Modification Date: N/A

Date Terminated: N/A

Inspecting Organization: EPA

Record of LUC: Master Plan or Equivalent

Documentation Date: 200905

LUC Enforcement: Annual Inspections, 5 Year Reviews

Contaminants: METALS, VOC

Additional Information

N/A

Cleanup Program Summary

Installation Historic Activity

The Marion LTA was formerly included in the Marion Engineering Depot (MED), which was established in 1942. The original mission of the MED property was to serve as a reserve depot for engineering supplies and equipment and to repair heavy engineering equipment. In 1961 the entire MED was placed in inactive status, and in 1962 the current LTA property was transferred to the US Army Reserve. Since that time, the LTA property has been used intermittently for training activities. There is no specific historical documentation describing the disposal of hazardous materials or waste at MED; however, past site assessments and investigations identified hazardous materials disposed of on parts of the Marion LTA. In 1998 training activities were suspended after hazardous materials were identified on the site. Training was suspended until the RAs were completed and the site was reopened in 2008 in accordance with the DD.

Installation Program Cleanup Progress

IRP

- Prior Year Progress:** LUCs are inspected annually by the Area Environmental Protection Specialist as part of their routine staff assisted visits (SAVs).
- Future Plan of Action:** LUC inspections will continue through the 88th RSC. Five-year reviews will be conducted as long as LUCs continue at the site.

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Army Defense Environmental Restoration Program
Installation Restoration Program

IRP Summary

Installation Total Army Environmental Database-Restoration (AEDB-R) Sites/Closeout Sites Count: 2/1

Installation Site Types with Future and/or Underway Phases

1 Surface Disposal Area
(LTA-01)

Most Widespread Contaminants of Concern

Metals, Semi-volatiles (SVOC), Volatiles (VOC)

Media of Concern

Soil

Completed Remedial Actions (Interim Remedial Actions/ Final Remedial Actions (IRA/FRA))

Site ID	Site Name	Action	Remedy	FY
LTA-01	Marion LTA	FRA	INSTITUTIONAL CONTROLS	2008
LTA-01	Marion LTA	FRA	WASTE REMOVAL - SOILS	2008

Duration of IRP

Date of IRP Inception: 199903

Estimated Date for Remedy-In-Place (RIP)/Response Complete (RC): 200805/200805

Date of IRP completion including Long Term Management (LTM): 204305

IRP Contamination Assessment

Contamination Assessment Overview

The Marion LTA property has been listed on the Federal Facilities Hazardous Waste Compliance Docket since June 12, 2000. A preliminary assessment (PA)/site inspection (SI) has been completed and in 2004 a performance-based acquisition (PBA) which included the sites at Marion LTA was issued by the USAEC. In May 2006 a supplemental SI was finalized. In February 2007 an engineering evaluation/cost analysis (EE/CA) was finalized. An action memorandum has been approved by the OEPA and was finalized in June 2007. In 2007 a non-time critical removal action (NTCRA) for soil and debris was completed. In December 2007 the draft final RA completion report and a site-wide draft final human health risk assessment (HHRA) were submitted to the OEPA. A DD was completed in fiscal year (FY)08. A five-year review was completed in 2012.

Cleanup Exit Strategy

Long-term management (LTM) is underway at LTA-01. The next five-year review is scheduled for FY17. Five-year reviews will continue as long as LUCs are in place.

IRP Previous Studies

Year	Title	Author	Date
1991	Environmental Assessment Marion Engineer Depot, 1990	ERM-Midwest, Inc. of Columbus, OH	JAN-1991
1996	Environmental Baseline Study, 1996, Marion Outdoor Training Area	Jaycor Environmental	DEC-1996
1997	Preliminary Assessment Marion Engineer Depot, 1991	US Army Corps of Engineers, Huntington District, revised 1997 by US Army Corps of Engineers, Louisville District	JUN-1997
1998	Archives Search Report Marion Engineer Depot	US Army Corps of Engineers, Rock Island District	JUN-1998
	Relative Risk Site Evaluation, US Army Reserve Property, Former Marion Engineering Depot, Marion, Ohio	Montgomery Watson	NOV-1998
1999	Marion LTA, Drum Sampling Report	Jones Technologies	JAN-1999
	Final Drum Removal Action Report, US Army Reserve Property, Marion Ohio	Montgomery Watson	MAR-1999
2000	Preliminary Assessment Report, Marion Local Training Area Marion, Ohio	SAIC for USACE Louisville District and 88th Regional Support Command and USARC HQ	OCT-2000
	Site Inspection Workplan, Marion Local Training Area, Marion, Ohio	Montgomery Watson	OCT-2000
2001	Draft Site Inspection, Marion Local Training Area, Marion, Ohio	Science Applications International Corp.	MAY-2001
	Draft Site Inspection Geophysical Report, Marion Local Training Area, Marion, Ohio	Montgomery Watson	AUG-2001
	Draft Site Inspection Geophysical Investigation Report Marion Local Training Area Marion, Ohio	SAIC for USACE Louisville District and 88th Regional Support Command and USARC HQ	AUG-2001
2004	Screening Level Human Health Risk Assessment, US Army Reserve Property, Marion, Ohio	Montgomery Watson	FEB-2004
	Draft Site Inspection Report, Marion Local Training Area, Marion, Ohio	Montgomery Watson Harza	MAY-2004
2005	Sampling and Analysis Plan, Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	MAY-2005
2006	Wetland Delineation for Local Training Area, Marion Engineer Depot East 88th Regional Readiness Command, Marion County, Ohio	BHE Environmental for USACE, Kansas City District	MAR-2006

IRP Previous Studies

Year	Title	Author	Date
2006	USARC GFPR Supplemental Site Investigation Report, US Army Reserve Local Training Area, Marion, Ohio	Kemron Environmental Services	MAY-2006
2007	USARC GFPR Final Scoping Level 1 Ecological Risk Assessment, Marion, OH	Kemron Environmental Services	JAN-2007
	General Isolated Wetland Permit, Marion LTA, Ohio	Kemron Environmental Services	FEB-2007
	USARC GFPR Final Engineering Evaluation/Cost Analysis, U.S. Army Reserve Local Training Area Marion, Ohio	Kemron Environmental Services	MAR-2007
	USARC GFPR Final Residual Human Health Risk Assessment Work Plan, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	MAY-2007
	USARC GFPR Storm Water Pollution Prevention Plan, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	JUN-2007
	USARC GFPR Final Action Memorandum, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	JUN-2007
	Final Traffic Control/Transportation Plan, Marion LTA, Ohio	Kemron Environmental Services	JUN-2007
	Final Wetland Mitigation Plan for LTA-16 Removal Action, Marion LTA, Ohio	Kemron Environmental Services	JUN-2007
	USARC GFPR Final Removal Action Work Plan, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	JUL-2007
	USARC GFPR Health and Safety Plan, Marion LTA, Ohio.	Kemron Environmental Services	JUL-2007
	USARC GFPR Draft Final Removal Action Completion Report, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	DEC-2007
2008	USARC GFPR Final Removal Action Completion Report, US Army Reserve Local Training Area, Marion, Ohio	Kemron Environmental Services	FEB-2008
	USARC GFPR Final Residual Human Health Risk Assessment, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Services	FEB-2008
	USARC GFPR No Action/No Further Action Proposed Plan, US Army Reserve Local Training Area, Marion, Ohio	Kemron Environmental Services	MAR-2008
	USARC GFPR, Decision Document, US Army Reserve Marion Local Training Area, Marion, Ohio	Kemron Environmental Studies	MAY-2008
2012	First Five Year Review, US Army Reserve Local Training Area, Marion, OH	Kemron Environmental Services	MAR-2012

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Site Descriptions

Site ID: LTA-01
Site Name: Marion LTA

STATUS

Regulatory Driver: CERCLA

RRSE: MEDIUM

Contaminants of Concern: Metals, Semi-volatiles (SVOC), Volatiles (VOC)

Media of Concern: Soil

Phases	Start	End
PA.....	199903.....	200009
SI.....	200009.....	200309
RI/FS.....	200309.....	200803
RA(C).....	200703.....	200805
LTM.....	200806.....	204305

RIP Date: N/A

RC Date: 200805

SITE DESCRIPTION

The US Army Reserve operates the 127-acre LTA in Marion, Ohio. It was formerly included in the MED. Historically, a 60-foot by 60-foot bermed area in the eastern portion of the LTA was used by MED workers to regularly burn fuel, oil, solvents, sludges, and debris accumulated during the course of normal operations. The burnings are estimated at approximately 2,000 gallons every one to two weeks. On March 29, 1999, 50 surface-laid drums were removed. Approximately 17 of the drums had contents that were either solidified paint waste or sandblast material and were considered characteristic hazardous waste based on exceedances for chromium and lead. Soil samples were collected as part of the drum removal. SVOCs, lead, and chromium were detected in the soil samples. Construction debris (dumped roofing tar, shingles, concrete) has been identified throughout the LTA. An HHRA was conducted. A PA/SI was conducted for the entire 127-acre parcel. The PA/SI activities included geophysical surveys, plus surface and shallow subsurface soil sampling.

The SI was performed in winter 2000. Surface soil samples from the west and central portions of the LTA indicated Resource Conservation and Recovery Act (RCRA) metals and SVOCs above industrial preliminary remediation goals. No contamination was found at depth. Surface soil samples collected in the disposal and burn areas on the east portion of the LTA indicated predominantly RCRA metals and SVOCs. An investigation discovered dioxins and furans in the surface soils at LTA-01.

In 2005 a supplemental SI was completed. An additional drum was discovered and removed during the SI activities. In September of that year monitoring wells were installed. Two sampling events showed no impacts to groundwater. The supplemental SI report was finalized in 2006.

An EE/CA and action memorandum for a soil removal were approved by the OEPA and finalized in February 2007. In June 2007 the action memorandum was signed and in October 2007 the soil and debris removal action was completed. The draft final RA completion report and a site-wide draft final HHRA were submitted to the OEPA in December 2007.

In FY08 the DD was completed by the PBA contractor and all LTM funds, except those for the five-year review, were exercised. The Army Reserve resigned from the existing RAB in October 2008. The RAB voted to adjourn on Nov. 19, 2009, and the RAB Adjournment Report was completed in July 2010.

Since soils with contamination levels above residential-use goals still exist at the site, five-year reviews are required. The first five-year review was completed in 2012 and the next will occur in 2017. LUCs and five-year reviews are the only LTM activities on this site. The 88th's Area Environmental Protection Specialist checks the LUCs annually during their routine SAVs.

CLEANUP/EXIT STRATEGY

LTM is underway at LTA-01. The first five-year review was completed in 2012. Five-year reviews will be conducted as long as LUCs continue at the site.

Site Closeout (No Further Action) Summary

Site ID	Site Name	NFA Date	Documentation
LTA-02	SURFACE DRUM DISPOSAL AREA IN N.W. LTA	200001	Any contamination is addressed under LTA-01.

IRP Schedule

Date of IRP Inception: 199903

Past Phase Completion Milestones

2000

PA (LTA-01 - Marion LTA, LTA-02 - SURFACE DRUM DISPOSAL AREA IN N.W. LTA)

2003

SI (LTA-01 - Marion LTA)

2008

RA(C) (LTA-01 - Marion LTA)

RI/FS (LTA-01 - Marion LTA)

Additional Past Phase Completion Milestones

2006 SSI LTA-01 Marion LTA

Projected Phase Completion Milestones

See attached schedule

Projected Record of Decision (ROD)/Decision Document (DD) Approval Dates

Site ID	Site Name	ROD/DD Title	ROD/DD Date
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Final RA(C) Completion Date: 200805

Schedule for Next Five-Year Review: 2017

Estimated Completion Date of IRP at Installation (including LTM phase): 204305

LTA - MARION ENGR DEPOT EAST IRP Schedule

= phase underway

SITE ID	SITE NAME	PHASE	FY14	FY15	FY16	FY17	FY18	FY19+
LTA-01	Marion LTA	LTM						

Community Involvement

Technical Review Committee (TRC): None

Community Involvement Plan (Date Published): 200602

Restoration Advisory Board (RAB): RAB established 199710

RAB Adjournment Date: 200911

RAB Adjournment Reason: All environmental restoration remedies are in place and are operating properly and successfully.

Additional Community Involvement Information

The 88th RSC was a stakeholder in a RAB hosted by the US Army Corps of Engineers Formerly Used Defense Sites (FUDS) program, along with the community of Marion, Ohio, for sites at LTA, MED and the Scioto Ordnance Plant. The RAB was established in 1997 and the LTA site was included in the RAB in 1999.

Formerly, the 88th RSC was a co-chair for this RAB which began on July 26, 2001. In 2004, when the USAEC began central management of the Marion project, the 88th resigned as co-chair and was replaced by the contracting officer representative of the PBA. The RAB met regularly. After the final DD was issued in 2008, the 88th RSC and USAEC resigned from the RAB in October.

LTA Marion has never had a separate RAB of its own. The installation is at remedy in place (RIP)/response complete (RC); therefore, it no longer has a requirement to solicit the community for RAB interest.

Administrative Record is located at

60 South O Street
Fort McCoy
Wisconsin 54656
608.388.7518

Information Repository is located at

Marion Public Library
445 East Church St.
Marion, Ohio 43302
765.668.2900

Current Technical Assistance for Public Participation (TAPP):N/A

TAPP Title: N/A

Potential TAPP: N/A

