



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

April 5, 2016

Ms. Mindy Clements  
United States Environmental  
Protection Agency  
77 West Jackson Boulevard  
Mail Code: SE-5J  
Chicago, IL 60604

**Re: Layer Park  
Remediation Response  
Correspondence  
Remedial Response  
Montgomery County  
557003209001**

**Subject: LAYER PARK, MONTGOMERY COUNTY, REQUEST FOR REMOVAL  
ACTION**

Dear Ms. Clements:

Ohio EPA requests U.S. EPA assistance in conducting a time-critical removal action at Layer Park, located at 4999 Cordell Drive in Miami Township, Montgomery County, Ohio. Layer Park was used as a skeet shooting range during the 1930s, 1940s, and 1950s. The park consists of a baseball field, tennis court, basketball court, picnic shelter, two swingsets, and a playground. Portions of the former skeet shooting range were also developed for private residences; a long time resident anecdotally recalled that she remembers shot landing on their roof when the range was in operation.

On February 29, 2016, Ohio EPA collected surface soil samples at the park and analyzed them for total lead. The analytical results confirm concentrations of lead in surface soils in excess of the U.S. EPA residential removal action level of 400 parts per million (ppm) and industrial removal action level of 1000 ppm.

Elevated levels of lead, a hazardous substance, are present in surface soils at the park and could become airborne as contaminated dust. Park visitors, including children, have the potential to ingest these contaminated soils. Dry, warm conditions can result in airborne suspension of contaminated dust. This has the potential to increase ingestion and inhalation of contaminated soils and dust. Please see enclosed removal action referral form and associated attachments.

Please feel free to call me at (937) 285-6062 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Proffitt", is written over a horizontal line.

Michael Proffitt, Acting Chief  
Division of Environmental Response and Revitalization

Enclosures

ec: Mike Starkey/Brian Nickel, DERR, SWDO  
Mark Rickrich, Manager, ARCA, DERR



## II. ASSESSMENT OF ENVIRONMENTAL HAZARDS AND PROPOSED RESPONSE ACTIONS

- A. DESCRIPTION OF ACTUAL OR POTENTIAL CHEMICAL/ PHYSICAL HAZARDS POSED BY SITE:

Lead contaminated soil from past skeet shooting activities.

- B. LIST ACTUAL OR POTENTIAL HAZARD THAT MEETS ONE OR MORE OF THE REMOVAL RESPONSE CRITERIA (SEE ATTACHMENT A) OR EXCEEDS A REMOVAL ACTION LEVEL (RAL, SEE ATTACHMENT B):

Soil samples collected at the site exhibit total lead concentrations above the residential Removal Action Level of 400 parts per million and the industrial RAL of 1000 parts per million.

- C. DESCRIPTION OF RESPONSE ACTIONS THAT SHOULD BE UNDERTAKEN TO REDUCE OR ELIMINATE HAZARDS:

Remove lead contaminated soil and replace with clean soil. Re-seed.

- D. EXTENUATING OR MITIGATING CIRCUMSTANCES:

None.

## III. SITE DESCRIPTION AND BACKGROUND INFORMATION

- A. SITE HISTORY AND OPERATIONS:

**Description of past or present operations and how wastes were generated, managed, and disposed:**

A skeet shooting range operated on the site during the 1930s, 1940s, and 1950s.

**Description of regulatory information (e.g., compliance issues, permits, regulated substances):**

N/A

**Description of past releases (e.g., substances, locations, impacts):**

Lead was deposited on the surface of the site by skeet shooting activities. There were two shooting stations to the south of the property boundary. Shooting occurred to the north.

B. SITE CHARACTERISTICS:

**Site layout (e.g., size, number of buildings, containment structures, topography, attach site layout map or sketch if available):**

The site is approximately 7 acres and relatively flat. There is a restroom facility/picnic shelter located on the eastern parcel. See Figure 2.

**Estimate of quantity, type and location of wastes and/or hazardous substances:**

An unknown quantity of lead was deposited on the surface of the site from past skeet shooting. Soil sampling results show lead contaminated soil above 1000 ppm in the southwestern and eastern portions of the park. See Figure 2.

**Substances present (e.g. labels on drums and containers) and the condition of their containers or containment (e.g., drums, lagoons):**

Lead contaminated soil.

**Evidence of releases (e.g., stained soil, stressed vegetation, fire response reports and/or vandalism incident reports):**

Potentially deteriorated lead shot or clay pigeons.

**Analytical data or other documentation on chemical characterization of wastes and contamination present (attach available analytical data):**

See attached XRF results and Figures 3 through 5.

**IV. THREATS TO PUBLIC HEALTH AND THE ENVIRONMENT**

A. POTENTIAL HUMAN AND ECOLOGICAL RECEPTORS:

**Population density within a one mile radius (underline one):**

1 to 100

100 to 1000

> 1000

**Nearby land uses (e.g., agricultural, commercial, industrial, recreational, residential):**

Commercial, recreational, residential.

**Public accessibility (e.g., fences, posted signs, security):**

Locked gate with access on either side to foot traffic. A “park closed” sign is mounted to the gate. Ohio EPA requested that further access restrictions be made to the eastern parcel and the southern portion of the western parcel on 3/22/16.

**Distance to possible human and ecological receptors (e.g., residences, schools, drinking water sources, parks, wetlands, threatened or endangered species):**

Human receptors recreate at the site. There are several residences adjacent to the north, west, and southwest.

**Locations of drinking water and monitoring wells (on site/immediate vicinity):**

A public water supply well is located approximately 1 mile northwest of the site.

**Locations of surface water bodies (e.g., ponds, streams) and wetlands:**

Holes Creek is approximately 0.25 miles to the west and south. The Great Miami River is located approximately 1.25 miles to the west.

**Above ground and underground drainage channels or pathways (e.g., ditches, storm sewers, utilities):**

Unknown.

**Blowing soils and air contaminants:**

Lead present in surface soils at the park could become airborne as contaminated dust.

**V. CHRONOLOGY OF REMOVAL ACTION EVENTS**

(Include a brief chronology of steps taken to compel responsible party(ies) to conduct site removal actions, if appropriate) N/A

**VI. INDEX OF DOCUMENTS AND PHOTOGRAPHS**

Aerial photos from ODOT – various years  
Soil Sampling Work Plan and H&S Plan – 2/26/16

**VII. CONTACTS**

District Office Contact

Name: Amanda Meyer  
E-mail address: Amanda.meyer@epa.ohio.gov  
Telephone No.: 937-285-6062  
Facsimile No.: 937-285-6249

**VIII. SIGNATURES**

Submitted by Amanda Meyer, Site Coordinator, DERR/SWDO:

Amanda Meyer m.s. Date: 4/5/16

Approved by Mike Starkey, Manager, DERR/SWDO:

Mike Starkey Date: 4/5/16

Approved by Bonnie Buthker, Chief, SWDO:

Bonnie Buthker Date: 4/5/16

## **Document Index**

### 1. Figures

- 1 – Site Location Map
- 2 – Site Features Map
- 3 – XRF results Map 0-6 inches
- 4 – XRF Results Map 6-12 inches
- 5 – XRF Results Map 12-18 inches

### 2. Aerial photos from 1938 and 1959

### 3. Excel Spreadsheet screening results 100-300+ ppm

### 4. Ohio EPA work plan dated February 26, 2016