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NCBC DAVISVILLE
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BCT MEETING NOTES 27 MARCH 2014 NCBC DAVISVILLE RI
3/27/2014
TETRA TECH



NOTES FOR THE 27 MARCH 2014 BCT MEETING FORMER NCBC DAVISVILLE

ATTENDEES

David Barney (Navy)	Christine Williams (EPA)
Jeff Dale (Navy)	Richard Gottlieb (RIDEM)
Joe Foran (The Management Edge)	Rachel MacPhee (Resolution)
Robert Shoemaker (Resolution)	Rory Henderson (Resolution)
Derek Pinkham (Tetra Tech EC)	Lee Ann Sinagoga (Tetra Tech, NUS)
Scott Anderson (Tetra Tech, NUS)	

The 27 March 2014 Davisville BRAC Cleanup Team (BCT) teleconference began at 1 PM and concluded at approximately 4 PM. The agenda for the teleconference is included as **Attachment A** of these notes.

Action Items are presented in **Attachment B**. The attendance list is **Attachment C**.

AGENDA ITEM NO. 1: REVIEW OF OUTSTANDING ACTION ITEMS

Outstanding action items from August 13, 2013, September 5, 2013, November 12, 2013, December 12, 2013, January 15th, 2014, and February 11, 2014 BCT teleconferences were reviewed and updated as shown in **Attachment B**. The following items summarize additional discussion points regarding action items:

- D. Barney did contact QDC (as requested by R. Gottlieb) to determine if QDC would be receptive to establishing the environmental land use restriction (ELUR) requested by RIDEM for the CED area sites. QDC (S.King) indicated that they were not receptive to the ELUR, primarily because of the associated soil management plan (SMP) requirements. C. Williams asked if RIDEM would accept an SMP that would allow movement of soils across the whole area that QDC controls (i.e., allow movement beyond the strict boundaries of any particular site or parcel). This would give QDC much more flexibility to handle soils in an efficient manner. R. Gottlieb will check with RIDEM management regarding this issue (Action Item No. 10 on attached Action Item list for March 27, 2014). Specifically, on what basis would movement of soils be allowed within the



broader area controlled by QDC (versus only allowing movement of soils within the boundary of a particular site)?

- D. Barney requested that R. Gottlieb define “jurisdictional soils”. R. Gottlieb stated that notification of RIDEM is necessary when RIDEM direct exposure criteria (DECs) area exceeded (i.e., a jurisdictional soil is a soil with chemical concentrations exceeding RIDEM DECs).
- D. Pinkham reported that 6 wells were installed/developed in the CED Drum Removal Area (two at each of the three selected monitoring locations, one upgradient and two downgradient locations.) J. Dale noted that only two wells at each of the three locations were installed as “typical” subsurface lithologies were encountered and therefore the potential third well at each pair was not necessary. S. Anderson stated that “typical” subsurface lithologies are brownish sands and gravels overlying a gray fine to very fine sand and silt overlying a till that range in sizes from sands to gravels (with gravels being indicative of the transition to the till). Specifically during the well installations, it was anticipated that a less permeable silt unit could be present within the gray fine to very fine sands; however, this was not found at any location. S. Anderson also noted that screening results – both PID and Color-Tec® - were non-detect throughout the borings. C. Williams stated that EPA will review the boring logs generated during well construction and comment if necessary.
- J. Dale summarized that the clean-up/maintenance actions at the CED Area outfall pipeline have been completed and the most of the remedial investigation (RI) field work for the QDC Outfall 001 site has also been completed. (The reader is referred to the presentation presented at March 27, 2014 RAB meeting for details.)

AGENDA ITEM NO. 2: RESPONSES TO REGULATORY COMMENTS ON THE SITE 16 RECORD OF DECISION (ROD) (published 01_24_14)

The response-to-comments (RTCs) document for regulatory comments received on the draft version of the Site 16 ROD and the draft-final version of the ROD document were published on March 26, 2014. Consequently, specific comments/responses were not discussed in detail at the BCT meeting. The following items summarize the discussions that did occur:

- R. Gottlieb presented and discussed a mark-up of a figure from the NCBC Davisville Environmental Baseline Survey (EBS) which depicted analytical results for the developed portion of Site 16 considered problematic by RIDEM (i.e., the results would require a “no residential use”



LUC for sections of the developed area). (The figure was previously sent to the Navy on March 25, 2014.) The data were generated during the EBS program (not the RI program) for EBS units identified, investigated, and adjudicated during that program. L. Sinagoga explained that, with the exception of the soils at EBS Review Item No. 81, the referenced analytical data was not considered in the Phase III RI risk assessment. Soil samples for EBS Review Item No. 81 were considered because the unit is located in the immediate vicinity of former Bldg 41, the primary source of the chlorinated volatile organic chemical (CVOC) plume in the developed portion of Site 16. The CVOC plume is the reason the Navy expanded the Site 16 area of investigation to include area south of Davisville Rd. This parcel (and the associated EBS Review Items) had been previously transferred without any environmental land use restrictions in 1998. There are no CERCLA decision documents that applied LUCs to this area, although a well installation notification was required based on uncertainty of the upgradient CED area site (see Finding of Suitability to Transfer [FOST] memorandum,). R. Gottlieb indicated that RIDEM was particularly concerned about some of the analytical results reported for EBS Review Items No. 81 and 63. L. Sinagoga stated that, based on the data presented on the RIDEM figure, some of the data may actually be data for sludge samples, not soil samples. **Post Teleconference Note 1:** Per e-mail correspondence of April 4, 2014, RIDEM has further evaluated the data presented on the March 25, 2014 figure and concluded, "Based on this evaluation RIDEM has determined that LUCs for soil are acceptable as proposed and requested by USEPA unless new information comes to light".

- There was an extended discussion regarding "how" sites should be viewed when making decisions as to "when" the RIDEM ARARs apply. For purposes of human health risk assessment of soils, Site 16 had been divided in to three exposure units (two units in the north central area [NCA] with the developed portion of Site 16 being the third soil exposure unit). Risk estimates for soils in the NCA exceed CERCLA risk management benchmarks; therefore, the RIDEM ARARs apply. However, risk estimates for soils in the developed portion of Site 16 do not exceed CERCLA risk management benchmarks; therefore, the Navy's position is that the RIDEM chemical specific ARARs do not apply. J. Dale also offered that the boundary of Site 16 was extended (to the southwest and northwest) to represent the extent of the CVOC plume at depth, and this should not be projected to land surface to incorporate unrelated sites/soil samples. EPA and RIDEM are not in agreement with the Navy position and believe a site should be viewed as one operable unit when determining whether or not ARARs apply. This issue was not resolved;



however, the issue may or may not be significant for Site 16 based on the RIDEM evaluation discussed in the preceding bullet and subsequent data review conducted by EPA/RIDEM. Action Items No. 2 and 9 of Action Item list for March 27, 2014 were established to assist in the resolution of this issue which will be further discussed at the upcoming May 13th, 2014 BCT teleconference. Should the team conclude that a "residential LUC" is required for the area south of Davisville Rd; the team will also discuss/determine the mechanism by which an updated selected alternative for the Site 16 soils is published (revision to the PP or Explanation of Significant Difference [ESD], post ROD). **Post Teleconference Note 1:** Per e-mail correspondence of May 7, 2014, R. Gottlieb provided the following comment on the draft BCT meeting notes: "Please note within this section that after internal discussions at RIDEM that if contamination is found, irrespective of what the original investigation was for, RIDEM must be notified in accordance with Section 5.0 of the RIDEM Remediation Regulations, amended November 2011 and addressed as appropriate."

AGENDA ITEM NO. 3: RESPONSES TO REGULATORY COMMENTS ON THE LONG-TERM MONITORING DATA SUMMARY AND OPTIMIZATION RECOMMENDATIONS REPORT FOR SITE 09

The *Long-Term Monitoring Data Summary and Optimization Report for Site 09: Allen Harbor Landfill, Former Naval Construction Battalion Center, Davisville, North Kingstown, Rhode Island* was published in December 2013. The Appendix F risk assessment sections of that document were distributed per Navy correspondence dated February 25, 2014. While some regulatory comments have been received, the regulatory review of risk assessments is on-going. Consequently, specific comments/responses were not discussed in detail at the BCT meeting. The following items summarize the discussions that did occur:

- The BCT agreed that the next monitoring events (MEs) for Sites 07/09 will occur in the late Summer/Fall of 2014. (No MEs will be conducted in the Spring of 2014.) The Navy believes that the objectives of the LTM program will be met by conducting one monitoring event per year at most.
- The Navy agreed to re-visit the recommendations presented in the December 2013 report. The EPA's recommendation is that the LTM program "key on remedial goals and objectives" and receptors of concern:
 - Generally, sediment and pore water sampling may be reduced (less than annually) in favor of more direct measurements obtained via shellfish tissue sampling.



- A back-up plan to collected sediment and/or pore water will be devised if shellfish are not available for sampling.
 - Wells along shoreline and immediately surrounding MW09-20I will remain a focus for CVOC.
 - PAHs and PCBs will be the focus of investigation with less frequent sampling for VOCs.
- EPA/RIDEM would prefer consistent sampling in the mudflat area (versus the breakwater area).
- There are no ELAP-approved preparation/extraction method/labs for the VOC from shellfish (prior to analyses) requested by EPA. This issue is unresolved; however, there is general agreement that shellfish samples should be collected during the Fall of the year (based on recommendations from Rick Sugatt).
- Analytical data collected during the LTMP will be forwarded to EPA/RIDEM per the timeframes specified in the Federal Facilities Agreement (FFA).
- The LTMP reports for Fall 2013 will be forwarded to the Navy/EPA/RIDEM per the timeframes indicated in the attached Action Item list for March 27, 2014.
- The EPA recommends more emphasis on the development of (and adherence to) schedules for Site 9 and all other sites at NCBC Davisville.

AGENDA ITEM NO 4: WRAP-UP AND OTHER MISCELLANEOUS ITEMS

- The Sampling and Analysis Plan (SAP) being prepared for the CED Area sites (including the removal action site) will be forwarded to the team in April 2014.
- The CED Area Drum Removal Action completion report will be forwarded to EPA/RIDEM by the end of April 2014. Navy will advise EPA/RIDEM regarding data/proposed disposal location for IDW water generated during the CED Area Drum Removal Action.
- Navy will continue to notify the BCT (via the EPA ADOBE site) regarding the progress of the field work for the QDC Outfall 001 remedial investigation.
- D. Barney vetted a proposal from QDC to conduct test pitting east of the field trailer (known as QDC Parcel 44). The test pits are to collect design data for stormwater management basins to support further development of Parcel 44. Prior work by QDC did not identify features of archeological significance. C. Williams questioned where the water exiting the basin(s) would go, and whether this would affect future investigation or remediation by the Navy at QDC-1 wetland.



This issue was unresolved, but overall concurrence was reached to allow QDC to excavate the test pits.

Several of these are on the Action Item list provided in **Attachment B**. The next BCT teleconference will be scheduled for Tuesday, May 13, 2014, 10 AM till noon. The next RAB is scheduled for Thursday, October 23, 2014.

ATTACHMENT A
AGENDA



AGENDA
FORMER NCBC DAVISVILLE
BRAC Cleanup Team (BCT Meeting)

Call in # 1-866-692-5721

Participant Code: 9158476

Date: March 27, 2014

Discussion Lead: Jeff Dale

Time: 1:00 PM to 4:00

AGENDA

1) Introduction

Goals:

- a. Review outstanding Action Items from previous BCT teleconferences.

2) Responses to Regulatory Comments on Site 16 ROD (published 01_24_14)

Goals:

- a. Discuss Navy responses-to-comments (RTCs)
- b. Establish path-forward for finalization of ROD

3) Responses to Regulatory Comments on LTM Data Summary and Optimization Recommendations Report for Site 09 (initial report published 12_20_13)

Goals:

- a. Discuss comments (formal RTCs have not been published)
- b. Establish path-forward for finalizing revisions to LTM by May 30, 2014.

4) Wrap Up

Goals:

- a. Discuss March RAB meeting.
- b. Agree on action items from this call.
- c. Confirm date and agenda of next call.

Action Items from Feb 11th, 2014 BCT Teleconference. See separate file.

ATTACHMENT B
ACTION ITEMS



**UPDATED ACTION ITEMS FROM THE 27th MARCH 2014 BCT
TELECONFERENCE
FORMER NCBC DAVISVILLE**

NEXT TELECONFERENCE/RAB:

The next BCT teleconference is set for Tuesday, May 13th, 2014, 10 AM till Noon.

The next RAB is Thursday, October 23rd, 2014 (7 PM).

Action Items:

Status of November 12th, 2013 BCT Call Action Items:

Status	Date Completed	Item
As is necessary. Updates are posted on the ADOBE site.	On-going as necessary.	1) Share weekly updates regarding field work accomplished at CED area sites and QDC Wetland. (J Dale)

Status of December 12th, 2013 BCT Call Action Items:

Status	Date Completed	Item
Original target Date = 12/20/13. Discussion with QDC done. Soil problem statement issue not resolved.	Deferred	1) CED area soil problem statement drafted for EPA/RIDEM review before sending to Tier 2 (J Dale). Update 2/11/14: D Barney to further discuss Site 03 ELUR issue with Navy legal counsel and then discuss with QDC. Update: 3/27/14: D Barney did discuss issue with QDC. QDC indicated that it was not receptive to establishing an ELUR at the CED; the soil management plan is the real issue. (See BCT notes for March 27, 2014.)



Status of January 15th, 2014 BCT Call Action Items:

Status	Date Completed	Item
By Feb 14 th .	Risk assessments sent to regulatory agencies on 2_25_14.	1) Advise BCT regarding delivery date for Site 09 Eco assessment (Appendix F3) of Site 09 Annual Report. (J.Dale/L. Sinagoga).
Original target date: By end of February 2014. New target date: Mid-April.	Target 4/18	2) SAP for CED soil/GW sampling. (J.Dale/L.Sinagoga). Update: 5/7/14: Internal review is ongoing and overdue. Will forward Draft to EPA/RIDEM by mid-May.

Status of February 11th, 2014 BCT Call Action Items:

Status	Date Completed	Item
Completed.	2/11/14	1) Distribute Nov/Dec 2013 BCT notes. (J.Dale)
2/25/24	Hold	2) Distribute CED FFS outline to EPA/RIDEM. (J.Dale)
Target date not specified.	Done.	3) Jeff, Scott, and Derek to discuss lithology and well screen issues for new CED area wells.
Target date not specified.	Done.	4) Distribute Jan 2014 BCT notes. (J. Dale/L.Sinagoga)



New Action Items Developed During March 27th, 2014 BCT Mtg:

Status	Date Completed	Item
Target date not specified.	Done	1) Send close-out report for landfill to C. Williams (J. Dale)
Target date not specified.		2) EPA/RIDEM to check with management regarding resolution of LUCs issue for area south of Davisville Rd. (C. Williams; R. Gottlieb). Update 4/4/14: RIDEM OK with LUCs as presented in DF ROD. (See BCT notes for March 27, 2014.)
Target date not specified.	Jeff and Scott	3) Navy to update/revise proposal for Site 09 LTM (recommendations presented in the Dec 2013 report will be revisited). (J. Dale/S. Anderson)
Mid-April to Navy.		4) Forward internal draft Round 42 LTM report for Site 09 to Navy in mid-April. Target mid-May delivery date to EPA/RIDEM. (R. Shoemaker)
Mid-May to Navy		5) Forward internal draft LTM report for Site 07/Fall 2013 event to Navy in mid-May. Target mid-June delivery date to EPA/RIDEM. (R. Shoemaker)
On-going.	Data tables provided	6) Forward LTM data to EPA/RIDEM. (R. Shoemaker/J. Dale)
Late April target date.	Pending #8	7) Forward CED Area Removal Action completion report to EPA/RIDEM (J. Dale/D. Pinkham)
Target date not specified.	4/16/14	8) Advise EPA/RIDEM regarding IDW water data/proposed disposal location for Drum Removal Action. (J. Dale)
Target date not specified.	Jeff on hold, RIDEM ok with Site 16 data	9) Send Phase III RI soils tables/locations figures for soils below Davisville Rd to EPA/RIDEM. (L. Sinagoga) Update 4/2/14: Info sent to Navy for distribution.
Target date not specified.		10) RIDEM to check with management regarding "Soil Management Plan" issue: Could the CED area (or NCBC Davisville) be viewed more holistically with regard to the restriction of the movement of soils? This would give QDC the flexibility to manage soils more efficiently. (R. Gottlieb)

ATTACHMENT C
ATTENDANCE LIST

