

N60200.AR.003810
NAS CECIL FIELD, FL
5090.3a

MINUTES FROM 20 JANUARY 2004 RESTORATION ADVISORY BOARD MEETING NAS
CECIL FIELD FL
1/20/2004
TETRA TECH NUS INC



Minutes

Cecil Commerce Center and Cecil Field Airport Restoration Advisory Board (RAB) Meeting Minutes Tuesday, January 20, 2004

A meeting of the Cecil Field Restoration Advisory Board (RAB) was held on Tuesday, January 20, 2004 in the Conference Room of Building 907 at the Cecil Field Commerce Center.

The following RAB members were present:

Community Members

Richard Darby, Community Co-Chair

Navy, Regulators, and Officials

Mark Davidson, Navy Co-Chair

David Grabka, FDEP

Debbie Vaughn-Wright, EPA

The following RAB members were absent:

Community Members

Diane Peterson, Alt. Community Co-Chair

Lisa Chelf

William Dike

Margaret Day Julian

Edward Renckley

David Scott

Iran Maisonet

Navy, Regulators, and Officials

Lewis Murray, USGS

William C. Wilson, SJRWMD

John Flowe, RESD City of Jacksonville

The following support personnel and guests were present:

Rusty Chandler (JAA), Andy Eckert (JEDC), Ralph Hogan (J.A. Jones), Mark Jonnet (TtNUS), Ron Kotun (TtNUS), Ralinda Miller (TtNUS), Bob Simpson (JAA), Rob Simcik (TtNUS), Mark Speranza (TtNUS).

Administrative

Richard Darby called the meeting to order at 7:05 PM. The July 2003 RAB Meeting Minutes were approved with no changes. The plaque in recognition of Diane Peterson's efforts for the RAB was shown to the attendees. It was decided that Mark Davidson and Richard Darby would sign a letter to be included with the plaque when it is sent to Diane. Rusty Chandler was introduced as the new Cecil Field Airport manager.

Proposed Plan for Site 49 and Record of Decision for Site 32

Rob Simcik of Tetra Tech summarized the recently finalized Proposed Plan (PP) for Operable Unit (OU) 5, Site 49 and the Record of Decision (ROD) for OU 12, Site 32. PPs are prepared to summarize the information and analyses that supported the proposed decision and to facilitate public participation in the remedy selection process. RODs are prepared to document the selected decision (remedy) in a format that is legally binding.

OU 5, Site 49 was used as a skeet shooting range from 1965 to 1998. The site was investigated from June 1999 through May 2001 to evaluate lead and benzo(a)pyrene contamination. An extensive investigation including the collection and analysis of 152 soil samples was conducted to delineate the extent of contamination at the site. Groundwater samples were also collected, and all groundwater results were less than Florida Department of Environmental Protection (FDEP) Groundwater Cleanup Target Levels (GCTLs). An Engineering Evaluation/Cost Analysis (EE/CA) was conducted to compare and evaluate remedial

alternatives. The EE/CA identified that 4,685 cubic yards of contaminated soil needed to be removed to meet an industrial reuse and that only approximately 1,000 additional yards of contaminated soil, 5,681 cubic yards, had to be removed for a residential reuse. Based on the EE/CA, an Action Memorandum was prepared that recommended a non-time-critical soil removal action be conducted to meet unrestricted (residential) reuse.

Two areas of soil were excavated by the Remedial Action Contractor (RAC), J.A. Jones, at Site 49. A total of 5,446 tons of nonhazardous soil contaminated with polynuclear aromatic hydrocarbons (PAHs) were removed from Area 1 in the northern portion of the site from August 1 through September 6, 2002. High water table conditions (localized flooding) caused delays in the excavation of Area 2. A total of 1,377 tons of nonhazardous lead-contaminated soil and 945 tons of hazardous lead-contaminated soil were removed from Area 2 from November 13, 2003 to January 5, 2004.

A Source Removal Report documenting the removal activities is being prepared by the RAC. A PP for no further action (NFA) at the site will be prepared and submitted to the RAB and the mass mailing list, and a notice of availability will be placed in the Florida Times-Union announcing the 30-day public comment period for the PP. After the comment period is completed and any comments are addressed, the ROD for NFA will be prepared and submitted.

Q: Has the soil that was excavated been replaced?

A: In the northern excavation area it has been replaced. The southern area is a wetland and was left low and replanted with the proper wetland seed mixture to restore those conditions after excavation.

OU 12, Site 32, Former DRMO Asphalt Storage Yard, includes a paved and an unpaved area and was used for the storage of hazardous and nonhazardous materials. Environmental investigations at the site began in 1993. Eight sampling events were conducted through April 2000 to delineate the extent of soil and groundwater contamination at Site 32. Concentrations of organic and inorganic contaminants at concentrations exceeding FDEP Soil Cleanup Target Levels (SCTLs) were detected in soil at the site. A non-time-critical removal action was conducted in August 2000 in the unpaved area of the site to remove 142 tons of soil contaminated with PAHs at concentrations above FDEP industrial SCTLs. An EE/CA was finalized in August 2002 to present and evaluate alternatives for the site. The PP was submitted on September 19, 2003 and identified the remedy as including land use controls (LUCs) to prevent residential development, maintenance of the asphalt pavement, and monitoring. The public comment period for the PP ended on October 24, 2003, and no comments were received. The draft ROD to document the actions identified in the PP is currently being reviewed by the Navy, EPA and FDEP. It is expected that the final ROD will be submitted next month, at which point final signatures will be obtained.

Q: Does the City have any problem with the site having to be left paved?

A: No.

Site 15 Update

Ron Kotun of TtNUS gave an update on Site 15, which consists of 85 acres in the southwestern section of Yellow Water Weapons Area. The site is heavily forested, was used for ordnance disposal, and also included trap and skeet ranges. Lead and PAHs were identified as contaminants in soil at the site. The Reuse Plan states that Site 15 is to be maintained as a green space. Cleanup levels were developed to be protective of recreational and ecological receptors and based on site-specific data. Cleanup levels for recreational receptors were determined based on site-wide, infrequent exposure assuming no picnic areas or other specific recreational areas are developed at the site. Surrogate species that have abundant available data were used to determine ecological cleanup levels at the site and make sure that species at the site are being protected. The shrew was chosen as the surrogate species for mammals and was evaluated based on 2-acre exposure areas. The mockingbird was chosen to represent birds and was evaluated based on site-wide exposure.

The exposure assumptions agreed upon included an exposure frequency of 50 days per year (infrequent), an exposure duration of 20 years, a soil ingestion rate of 50 milligrams per day, a surface exposure area of 3,000 cubic centimeters, an inhalation rate of 15 cubic meters per day, and a body weight of 35 kilograms. The body weight assumption was changed from 70 kilograms last year to account for younger people, and that lowered the cleanup levels.

For carcinogenic PAHs (cPAHs), the site-wide cleanup level is 2,250 parts per billion (ppb, $\mu\text{g}/\text{kg}$) and is protective of a recreational receptor. To meet this cleanup level, soil with cPAH concentrations, in terms of benzo(a)pyrene equivalents, greater than 35,000 ppb. The State of Florida also has a “3 times” rule of thumb that requires that all concentrations greater than 3 times the cleanup number need to be removed. To comply with the 3 times rule, soil with cPAHs greater than 6,750 ppb must be removed. Based on these cleanup levels and after remediation to protect human health, there is no need to remediate the site to be protective of ecological receptors.

Lead cleanup levels have not changed over the last year and are as follows:

- Human (site-wide exposure area) – 3,281 parts per million (ppm, mg/kg)
- Bird (site-wide exposure area) – 1,149 mg/kg
- Mammalian (2-acre exposure area) – 2,512 mg/kg
- Human (acute toxicity) – 6,500 mg/kg . This cleanup level was determined based on studies by EPA and Battelle labs and was added to be protective of children ingesting large amounts of soil (2 grams).

The pre-remediation average lead concentration to protect human and bird receptors is 900 mg/kg . The pre-remediation maximum lead concentration is 41,400 mg/kg . The post-remediation cleanup number for lead is now 6,500 mg/kg .

Removal of cPAHs at concentrations greater than 6,750 ppb results in a site-wide concentration of 700 ppb. (For reference, the industrial SCTL is 500 ppb). Removal of lead at concentrations greater than 6,500 ppm results in a site-wide concentration of 680 ppm (For reference, the residential SCTL is 400 ppm). This lead remediation also results in a maximum 2-acre lead concentration of 2,069 ppm, which is less than the level needed to protect the shrew. Excavation areas are being determined using geostatistics, rather than just “connecting the dots” between samples, because of the large amount of data available. Currently, the Feasibility Study (FS) is being prepared, and six alternatives are being evaluated as follows:

- Alternative 1: No Action. We are required under Superfund to look at this option for comparison purposes.
- Alternative 2: Excavation to Recreational Cleanup Levels, Off-Site (proper) Disposal, and LUCs (requiring that the area remain a green space).
- Alternative 3: Excavation to Unrestricted Use (no LUCs would be required), and Off-Site Disposal (as a comparison with recreational cleanup).
- Alternative 4: Soil Cover (a 1-foot thick cover across the contaminated areas) to Meet Recreational Cleanup Levels and LUCs (to ensure use only as a green space). For this alternative, FDEP would require a synthetic fabric (geomembrane) to prohibit exposure to soil from 0 to 2 feet below ground surface and inspections to verify the continued integrity of the cover and fabric.
- Alternative 5a: Excavation to Meet Recreational Cleanup Levels, On-Site Treatment (soil washing) and Reuse of Soil, and LUCs (to ensure use only as a green space). Soil washing involves passing some kind of agent through the soil to “wash” out contamination and then collecting the rinsate and fine-grained materials.
- Alternative 5b: Excavation to Meet Unrestricted Use, On-Site Treatment (soil washing), and Reuse of Soil (evaluated as a comparison with recreational cleanup).

Preliminary cost estimates for these options are as follows:

- Alternative 1: No Action – \$0.
- Alternative 2: Excavation to Recreational Cleanup Levels, Off-Site Disposal, and LUCs – \$1,070,000.
- Alternative 3: Excavation to Unrestricted Use, and Off-Site Disposal – \$15,737,600.
- Alternative 4: Soil Cover to Meet Recreational Cleanup Levels and LUCs – \$660,000
- Alternative 5a: Excavation to Meet Recreational Cleanup Levels, On-Site Treatment (soil washing) and Reuse of Soil, and LUCs – \$3,500,000.
- Alternative 5b: Excavation to Meet Unrestricted Use, On-Site Treatment (soil washing), and Reuse of Soil – \$27,700,000.

Currently, we are refining the delineation of the areas that need remediated so that the costs can then be refined.

Q: How would the LUCs be written?

A: The LUC wording is still being finalized, but there would be a prohibition for using the site as anything other than a green space, meaning that no active recreational areas could be developed and no residential or industrial development could occur.

Q: What would the soil cover in Alternative 4 do to stormwater management in the area?

A: Because there is to be no development in the area, there would be no impact.

Q: Can the City log the property in the future?

A: That is still to be determined. An evaluation to determine appropriate areas for logging could be conducted.

Q: If it is logged, would replanting be necessary?

A: Not necessarily. The Navy will not replant what is impacted by the City.

Building 324 TCE Plume Update

Mark Jonnet of TtNUS provided a summary of a new site that was recently discovered near the flightline. Building 324 is located south of the North Fuel Farm (NFF) and north of the Jet Engine Test Cell (JETC) site. It is a single-story, sheet metal building built in 1989 and, according to the 1994 Environmental baseline Survey (EBS), was used periodically by DYN-COR for engine maintenance activities. The EBS identified a transformer [potentially containing polychlorinated biphenyls (PCBs)] and a hazardous materials locker as potential environmental concerns associated with the building. There were no indications of releases from the hazardous materials locker, and no PCBs in the sample collected to evaluate the transformer.

As mentioned during the July 2003 meeting, Embraer, a Brazilian aircraft manufacturer, is interested in Cecil Field and chose the Building 324 area as the preliminary location of its facility. During the due diligence investigation conducted by Golder in November 2003 as part of the facility siting process, trichloroethene (TCE) was detected in temporary wells immediately south of Building 324. TtNUS resampled the wells to confirm the TCE detections and then installed permanent wells at these locations. To delineate the extent of the groundwater contamination and to look for a possible source of contamination within the soil, a Phase I direct-push technology (DPT) soil and groundwater sampling event was conducted by TtNUS in January 2004. Soil sample results were all less than detection limits. Phase I groundwater results showed two other

areas with high TCE concentrations, one northwest and the other southeast of the building. Groundwater contamination to 30 feet below ground surface is fairly well defined based on the sampling to date, but further delineation of deeper groundwater contamination is required based on the Phase I results. A Phase II investigation including approximately 36 groundwater samples at 12 locations has been proposed to complete delineation of groundwater contamination at the site. The proposal will be discussed by the BCT at tomorrow's meeting.

Bob Simpson of JAA mentioned that Embraer recently adjusted their proposed footprint to exclude the site and that they had already signed an agreement with JAA, so there was not impact to their plans from the discovery of the site. He also thanked Mark Davidson and Tetra Tech for their quick action to investigate the site.

Q: How was the site missed to start with?

A: None of the information related to the building or activities conducted there or observations during the EBS suggested that a potential for contamination existed.

Q: If Embraer or another company finds something like this, is DoD responsible for the cleanup?

A: Yes. That is why the due diligence investigations are done before site development activities begin. If the site is developed and then a problem is found later, there is a question as to who is responsible. Future owners are given a covenant when property is transferred that DoD is "on the hook" forever for contamination for which they are definitely responsible.

Sites Update

The Record of Decision (ROD) for OU 11, Site 45, the model ROD used to get LUC language approved and that held up progress for so long, was signed by the Navy in October 2003 and EPA in November 2003. It was the first ROD with LUCs approved by EPA and DoD. An Explanation of Significant Differences (ESD) was finalized in October 2003 to modify RODs for sites that had LUCs as part of the remedy and had final RODs in place before adoption of the new language. This includes Sites 1, 2, 3, 5, 8, 16, 17, 36, and 37. LUC language for the LUC Remedial Designs (RDs) is currently still being negotiated. LUC RD documents will be prepared for these sites once the LUC language has been finalized. After completion of the LUC RDs, the Operating Properly and Successfully (OPS) reports, which document that the sites are eligible to be transferred, should be approved in 6 to 9 months.

Installation Restoration (IR) Sites

OU 1, Sites 1 and 2 are in the 7th year of long-term monitoring.

Sampling at OU 2, Sites 5 and 17 was turned over to Ellis Environmental as part of a DoD-wide initiative to award routine sampling activities to small businesses. The 1st Semi-Annual, Year 6 sampling event at Site 5 and the 1st Semi-Annual, Year 7 sampling event at Site 17 were conducted by Ellis in July 2003.

The OU 3, Site 7 final Remedial Action Report documenting the site's NFA status was finalized in September 2003. The OU 3, Site 8 1st Semi-Annual, Year 6 event was conducted by TtNUS in August 2003.

The FS for OU 5, Site 15 is currently being prepared, and then a PP and ROD will be completed. Soil excavation and site restoration at OU 5, Site 49 was completed in December 2003, and a PP and ROD are being prepared.

For both OU7, Site 16 and OU8, Site 3, Final Year 4 Annual Reports were submitted in August 2003, and 2nd Semi-Annual, Year 5 sampling events were conducted by Ellis in July 2003. There are some concerns about the OPS for Site 3 because there have been significant rebounds in groundwater contaminant concentrations after shutoff of the air sparging (AS) system.

At OU 9, Sites 57 and 58, the final PP was submitted in July 2003, and the final ROD is being prepared based on regulatory comments. The 4th quarter, Year 1 sampling event for these sites will be conducted in January 2004.

For OU 10, Site 21, a final revised and a draft revised PP were submitted in October 2003. Approval of the final ROD for OU 10, Site 25 is pending. At both sites, 1st Semi-Annual, Year 2 sampling was conducted in August 2003, and 2nd Semi-Annual, Year 2 sampling will be conducted in January 2004.

Year 2 annual sampling was conducted at OU 11, Site 45 in May 2003, and the draft report is being prepared. Year 3 annual sampling is scheduled for May 2004.

A final ROD for OU 12, Site 32 was submitted in December 2003, and regulatory approval is pending.

Petroleum Sites

The North Fuel Farm is one of the few remaining sites where a groundwater remediation system is yet to be installed. A contractor is on board to install the system, and FDEP approval of the design is pending. At the South Fuel Farm, soil contamination was rebaselined, and the results will be incorporated into the RAP Addendum.

The Biosparge and vapor collection system at Day Tank 1 and the AS/SVE system at 103rd Street Pipeline at A Avenue have both been shut off for approximately 6 months, and rebound is being monitored. The soil excavation is almost complete, although there is still some contamination under the liner of the former spill containment pond. Land use in the area will be unrestricted except for groundwater use restrictions.

At Building 80, Tank 80, groundwater monitoring results have been less than FDEP GCTLs for the last two semi-annual events, so the site can go NFA.

At Building 271, the old gas station, the AS system began operating at the end of November.

Miscellaneous

A mechanism was found to transfer the Golf Course Parcel involving a Restrictive Covenant signed by the City and FDEP requiring that the area remain a golf course until cleanup appropriate for other use(s) is completed. The Navy has signed the Golf Course Finding of Suitability to Transfer (FOST), and now the City and FDEP have to sign the Restrictive Covenant.

The public comment period for the Hazardous and Solid Waste Amendments (HSWA) Permit ended in December 2003. No comments were received. The HSWA Permit lists all sites with ongoing cleanup activities. It was formerly an EPA permit, but was delegated to the State with CERCLA authority.

Upcoming Field Events

January 2004 is a major sampling event including sampling of Sites 8, 21, 25, and 57/58 by TtNUS and sampling of Sites 3, 5, 16, and 17 by the Ellis Environmental.

Conclusion

The next meeting is tentatively scheduled for July 20, 2004 at the same location (Building 907). If anyone has any suggestions as to future RAB agenda items, contact one of the BCT members. If the location changes, a public notice will be placed in the Florida Times-Union announcing the new location. The meeting was adjourned at 8:10 PM.