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NOTES FROM BASE REALIGNMENT AND CLOSURE TEAM MEETING DATED 14 JANUARY
2003 CNC CHARLESTON SC
1/17/2003
CH2MHILL

Notes from January 2003 BCT Meeting Navy's CNC BCT Office, Charleston, SC

PREPARED FOR: Charleston Naval Complex BCT
PREPARED BY: Richard Garcia
DATE: January 17, 2003

The January 2003 BCT Meeting was held at the Navy's CNC BCT office in Charleston, South Carolina. The meeting began at 1315 hrs on Tuesday, January 14, 2003, and concluded at 1200 hrs on Wednesday, January 15, 2003.

Tuesday, January 14, 2002

The meeting began with introductions of team members, agenda review, and action item review. The action items list from the previous meeting was reviewed with the following outcomes:

- Tony will compile the list for construction criteria at CNC following property transfer and present it no later than the next BCT meeting. Ongoing
- Provide a cross-section beneath the training building at SWMU 166 to demonstrate no pathway for Indoor Air for Human Exposure Environmental Indicators (EI) and analytical data from existing wells/soil samples in the vicinity of the structure to justify this rational. Ongoing. Rob Harrell is lead for this.
- Tony and Gary to develop EBS addendum to address Cooper River oil spill. Completed.

Zone J Website

Ensafe provided an informative briefing on a new web site they have created that provides key information for the Zone J portion of the CNC project. The website is designed to provide information relevant to schedules, existing documents, analytical data, and maps of the CNC related to assessing potential impacts to Zone J, the surrounding water bodies at the CNC. Ensafe still plans to provide hard copies of documents prepared by their firm to DHEC, EPA, and the Navy, but all other parties interested in reports associated with Zone J will have to obtain the documents via the website. Charley Vernoy will be the point of contact with regard to obtaining access to the website. The website also has a feedback component that allows users to comment with regard to information from the web site or suggestions for improvements. The site also has a search capability when looking for relevant information. The analytical data provided by the web site is not just for

Zone J but it is all-inclusive for all areas and data collected at the CNC. The latest data available is noted in the screen. It was noted that the latest analytical data may lag based on the time issued by CH2M-Jones and the time that is loaded by Ensafe to the web site. The site also allows for queries and has a member list as part of the pull down menus.

It was noted that the web site does not currently offer the capability to show which sites have obtained NFA status or which wells have been abandoned. The site can be access at maps.ensafe.com. For more information on the web site, Mr. Costi Tudan can be reached at 901-372-7962 or at ctudan@ensafe.com.

Hydrodynamics of Charleston Harbor

Mr. Ivan Chou, PE from ECT (a consultant to Ensafe) provided an informative briefing associated with the movement of water and pollutants at the Charleston Harbor. He explained the potential for contaminants to migrate from the CNC to the Charleston harbor estuary. He listed the tides, freshwater inflow, bathymetric and boundary geometry, wind, and density stratification as the major factors affecting estuarine hydrodynamics. He discussed factors affecting pollutant transports, pollutant transport process, historical data associated with tides and current velocities from the Cooper, Ashley, and Wando Rivers. He offered information regarding tidal excursion, salinity, watersheds, stormwater runoff, sediment loading, and potential deposition areas from the Cooper River at the CNC. He also offered similar information from Noisette Creek and Shipyard River. As part of his conclusion he stated that potential contaminants from CNC could travel to a large area in the estuary, contaminants found in the Cooper River near CNC may come from remote areas, there is a large tidal dilution at the Cooper River, Noisette has efficient flushing, and Shipyard creek is near stagnant and has inefficient flushing.

Update on Field Activities and Status of Various Sites

RCRA Field activities performed in the months of November, December, and January:

November:

Sampled and conducted a pump test at AOC 617.

December:

Collected soil samples at SWMU 25/70

Collected GW samples at SWMU 6/7

Collected soil and GW samples at SWMU 21/54

Collected GW samples at SWMU 166

Collected GW samples at SWMU 196

Free product removal at SWMU 39, AOC 633

Collected GW samples at SWMU 3

Vapor analysis of AOCs 67 and 102

Collected soil samples at AOC 546

January:

Collected GW samples at SWMU 607

SWMU 9 GW sampling

Excavated and disposed of soils at SWMU 5

AFVR at SWMU 17

Collected soil samples at AOC 620

FOSET/EBS and Permit Descoping

Tony provided a review of the ongoing Phase IV EBS, FOSET, and permit descoping activities and schedule. Comments from DHEC and EPA on the EBS and FOSET documents are scheduled to be provided later this month. The RCRA Permit modification for the phase III EBS/FOST will be prepared for public notice now that issues associated with AOC 609 have been resolved. It is anticipated that the noticed can be placed within two weeks from the date of this meeting. There will be a 45-day public comment period and a public meeting within 15 days of issuing the notice. With regard to the permit descoping, DHEC plans to hold an internal meeting on January 28, 2003 to discuss this issue.

RAB Meeting Preparation

The agenda for the RAB meeting was discussed. The three key topics to be presented at the meeting are 1) status of EBS/FOST/FOSET process 2) presentation of the hydrodynamics of Charleston Harbor and 3) presentation of the operation and maintenance groundwater monitoring plan. Tom Beisel provided a Power Point presentation describing the groundwater-monitoring plan.

Wednesday, January 15, 2003

RAB Debrief

The first observation noted concerning the results from the RAB meeting conducted yesterday was the lack of attendance. Only two individuals from the RAB board, other than the DHEC, EPA, and Navy representatives, were in attendance. It was noted that the board should evaluate the frequency of the meeting. It was suggested that a subcommittee from the RAB should evaluate any meeting frequency changes.

SCDHEC Comments on SWMU 42/AOC 505 RFIRA/IMCR/CMSWP

The purpose of this session was to address recent comments received from DHEC regarding additional sampling requirements prior to obtaining NFA status on this site. Tom B. provided an overview of GW flow direction in the upper and lower aquifers and plume areas, which indicated that COCs at the northern boundary of 42/505 are attributed to SWMU 39. DHEC stated that sampling in the vicinity of a laydown concrete pad North of SWMU 42 indicates that the area could be a potential source area. DHEC requested that soil sampling be performed in this area to evaluate if a new source is located by the concrete pad. The RFA was reviewed and all parties agreed that the pad was located outside the area and definition of SWMU 42/505. DHEC also indicated that the downgradient extent of the deep VOC plume at SWMU 42 may be undefined and that an additional well may be beneficial. DHEC recognized that as long as the concerns about delineation were addressed under the SWMU 39 activities, they would not object to issuing a NFA status to SWMU 42. An evaluation of any impact from SWMU 39 to Noisette Creek may be required as part of the EI at this location.

OWS Comments Regarding Structural Integrity

A brief discussion regarding a DHEC requirement to conduct a structural integrity assessment and warranty of OWSs was lead by Dean W. and Rob H. CH2M Jones indicated that while they understood the concerns that DHEC has regarding potential releases from OWSs, the approach that DHEC has identified as mandatory for all OWSs at DOD facilities in the state raises issues and liabilities that may not have been considered when the "OWS Process Memo" was drafted by DHEC staff.

It was noted that CH2M Jones believes that the structural integrity assessments of OWS may not fall under the scope of work contracted by CH2M-Jones and it is not viewed as a regulatory requirement specified under the RCRA Corrective Action program. Rob Harrell noted that for the Navy to commit funding to assess the structural integrity of these units would be considered a capital improvement for the property, which the Navy is not in a position to fund for property that is being transferred. It appears that the appropriate responsible party for assessing and certifying the integrity of the OWSs would be the party that wishes to continue operating them in the future, which is neither the Navy nor CH2M Jones.

There are also significant potential liabilities associated with a structural integrity evaluation of the OWS that should be borne by the party operating and profiting from the operation of the units. Jerry stated that the comment was based on an internal guidance and is used primarily for the purpose of eliminating any future liability if a new operator wishes to utilize the structure. It was noted that in some cases, the new tenants plan to remove the OWS once the NFA is granted, so it does not appear practical to conduct a structural integrity study for a structure that may be removed. It was also discussed the possibility to plug any line leading to the OWS, bypassing the OWS, or filling the OWS structure to prevent its use. It was decided that the topic be discussed with DHEC management for a consensus.

Revised Submittal Tracking Table

The submittal tracker was reviewed at the meeting. Gary presented key submittals under review and upcoming documents from CH2M-Jones. It was noted that based on current workload at DHEC and resources available, that EPA should be considered as an alternative for future documents that will be submitted by CH2M-Jones or for those documents associated with sites where the review process by DHEC has not yet begun.

AOC 724 - UXO along Halsey Street

Greg Wilfley and George Overby, both members of the CH2M Hill RAC Team, provided an update on the recent UXO findings and discussed the proposed path forward for the Halsey Street AOC. They also provided general information about the ordnance and explosives sites, technology used to characterize and remediate a UXO sites. The presentation provided a summary of the two rounds discovered, the location, the reporting, and proposed actions to follow. They noted how the review of historical information could assist in determining the level of risk. They also discussed safety issues and differences between environmental and OE project development. They elaborated on the three phases of an OE project: preliminary assessment/site investigation (PA/SI), engineering evaluation/cost analysis (EE/CA), and removal action (RA). During the question and answer session, Tony requested that the RAC contractor evaluate the short-term concern of identifying options/path forward for the completion of the utility work being performed by the contractor that discovered the ordnance-related items. That contractor was given a stop order for work to be executed at this location. Clearance for a utility corridor and recommendations to reroute the utility line were two options discussed. The RAC contractor will work on this task.

Site Visits

Various AOCs and SWMUs were visited after the meeting.

List of Attendees:

U.S. Navy: Rob Harrell (Wednesday only), Tony Hunt, Alan Shoultz (Tuesday only)

USEPA: Dann Spariosu,

SCDHEC: Jerry Stamps, Gill Rennhack, JoCherie Overcash, Mansour Malik, Susan Byrd (Tuesday only).

CH2M-Jones: Gary Foster, Dean Williamson, Tom Beisel, Richard Garcia.

CH2M-Hill RAC Contractor: Greg Wilfley, George Overby (Wednesday only)

Ensafe: Charlie Vernoy, Greg Benfield, Costi Tudan (Tuesday only)

ECT (subcontractor to Ensaf): Ivan Chou (Tuesday only)