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NOTES FROM BASE REALIGNMENT AND CLOSURE TEAM MEETING DATED 10
SEPTEMBER 2002 CNC CHARLESTON SC
9/19/2002
CH2MHILL

Notes from September 2002 BCT Meeting Navy's CNC BCT Office, Charleston, SC

PREPARED FOR: Charleston Naval Complex BCT
PREPARED BY: Richard Garcia and Gary Foster
DATE: September 19, 2002

The September 2002 BCT Meeting was held at the Navy's CNC BCT office in Charleston, South Carolina. The meeting began at 1300 hrs on Tuesday, September 10, 2002, and concluded at 1100 hrs on Wednesday, September 11, 2002.

Tuesday, September 10, 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:

- Regarding Cecil Field LUCs on golf course area and a comparison to the golf course area at the Base, Dann provided a brief update and indicated that based on the current proposed use of the golf course area as a park, he did not have reservations as to any requirement for further work. If the area became residential, further review may be required.
- CH2M forwarded comments on the 90% design for the Ave. D improvements
- Gary and Tony are drafting a document summarizing property transfer/LUC issues for inclusion in the project notebook.
- David Scaturro to develop write up, and forward to BCT members for review, on submitting the CNC project as a pilot site - Ongoing.
- Gary provided the team members an updated submittal tracker.
- CH2M-Jones is evaluating free product at SWMU 39 well 18. This item is addressed further under field activities.
- CH2M forwarded two copies of the project notebook for Mr. Hargrove and the public file.

Update on Field Activities and Status of Various Sites

CH2M-Jones provided an update on activities at the following sites:

AOC 680: Soil sampling completed in August.

AOC 596: Soil Sampling performed this week.

SWMU 9: Groundwater Sampling performed in August.

AOC 633: Wells to be installed in September

SWMU 21/54: Sampling scheduled in September.

SWMU 39: Sample collected at well 18. Hydraulic fluid identified as free product based on analytical results. Dean presented laboratory chromatograms of the analytical data confirming hydraulic fluid in the well. No source identified to date. Agreed to bail free product every two weeks at first and then once a month thereafter to see whether this solves the problem. May need to check grout at well.

Presented new VOC plume visualization figures based on most recent DPT groundwater sampling at SWMU 39. Extent of plume is confirmed and better resolved than previously. No additional groundwater DPT assessment planned at this point. The most recent information will be provided in upcoming reports (such as the SWMU 39 CMS).

Briefly discussed effects from HRC injection. Preliminary indication showed some progress only very close to the area of injection but no impact to the overall plume. CH2M-Jones currently evaluating other remedial approaches as part of the SWMU 39 CMS Sampling along railroad tracks was also discussed with latest round performed in February 2002.

AOC 38: Analytical results for the recent groundwater IM showed that one well still has concentrations of DDD above the RBC but DDD concentrations in another well were reduced to below the RBC. Results to be presented in the SWMU 38 Groundwater IMCR.

SWMU 3: Soil IM is completed. New wells will be installed in September. Paul B. indicated he would like to be notified and present during the installation of wells at this site.

SWMU 42: Report out last week requesting closeout of this SWMU, with proposal to address VOCs in groundwater as part of the SWMU 39 plume.

AOC 633: Wells scheduled to be installed in September.

AOC 563 (Bldg 177): Proposing a new AOC for paint booth area inside the building. Need to develop work plan.

AOC 722: Contractual issue. Tony working from Navy's side.

SWMU 166: Final injection scheduled in September

SWMU 196: Performance sampling performed this week.

Gridwell H: Site sampled. Analytical results indicate low detection of Benzene and naphthalene at a deep well. This result is consistent with previous sampling events. Tony to provide 1940's Base maps that may provide a history/source location for this contaminant. Groundwater at this site has greater than 10,000 mg/L TDS. Jack G. suggested that we may want to consider assigning this well to a nearby SWMU/AOC and monitoring in the future.

OSHA vs. RCRA Standards for Hg Indoor Air

A discussion regarding acceptable mercury indoor air levels was lead by Dean. Based on OSHA standards, ambient air levels at SWMU 67 (Bldg 3) have acceptable mercury levels (based on PELs NIOSH exposure criteria. EPA Region III ambient air RBC levels are more stringent because they are based on residential criteria (350 days per year, 24 hours per day, 30 year exposure). It was decided to resample ambient air inside using a real time mercury vapor analyzer (e.g., Jerome analyzer unit) at SWMU 67 at the breathing level. Dean suggested having a risk assessor calculate an appropriate industrial air value and use a risk assessment approach if levels exceed the residential RBC.

Revised Federal MCL for Arsenic

Dean briefly discussed the revised 2002 federal MCL level for Arsenic of 10 ppb. DHEC noted that the revision may only affect a small number of sites within the State and that implementation of the new level by the State may take until second or third quarter of 2003. It was noted that the arsenic background levels used in grid wells might not meet the new standard. It was noted that the background levels were part of the public record, therefore, no additional regulatory requirements are anticipated.

How to Implement LUCs prior to Remedy Selection

Tony introduced Lawson Anderson and Allan Jenkins, two members of the firm Tetrattech NUS, which will be developing the FOSET document. Tony led a discussion regarding how to implement LUCs prior to remedy selection and the review of the schedule for the FOSET and the EBS IV documents proposed at the August BCT meeting.

The FOSET requires:

- Analysis of future use
- Risk analysis
- Response/Corrective Action/ O&M
- Contents of deed/transfer agreement
- Access provisions
- Restrictive covenants (LUCs)

The Corrective Action requires:

- RFI

- CMS (remedy selection)
- SOB
- CMI (remedy implementation)
- LTM - O&M

It was suggested that if LUCs were implemented as interim measures (IM) they could become part of both the FOSET and eventually the corrective action. It was not clear from the participants whether this was necessary or not. It was also noted that from a real state transaction it would become difficult to go back and change the LUCs after the property was transferred from the Navy. Dann noted that the language was typically incorporated into the FOSET. At CNC we could expect restrictions on groundwater, soil disturbance, deep foundations for new structures (i.e. engineering controls), and use (i.e. industrial vs. residential) at various locations throughout the base. Dann offered to provide a copy of a FOSET from a recent early transfer site in Alabama. Tony indicated that a land use management plan would be developed providing the FOSET criteria and the history of environmental issues for each area. He also noted that the Brownfield agreement could be executed post FOSET but prior to remedy selection.

Tony suggested that we proceed with drafting the language utilizing the IM approach. Stacy also indicated that Keith Collinsworth had expressed some concerns at the August BCT meeting that needed to be addressed. Tony plans to discuss these issues with senior DHEC personnel. Stacey agreed to address issue of whether an IM was required with DHEC management.

RAB Meeting Preparation

The agenda for the RAB meeting was discussed. The two key topics to be presented at the meeting are a discussion of contaminants from Amerada-Hess at the northern property boundary of the Base and a presentation regarding Early Transfer of the Charleston Base. It was noted that Mr. Steve Freeman would be leading the presentation regarding Hess. Tony introduced Mr. Jeff Meyers (SOUTHDIV) to the Team. Mr. Meyers has previous experience with early transfer of Navy facilities and would be responsible for making the early transfer presentation to the RAB group. Mr. Myers proceed to conduct a dry run of the presentation to the BCT group.

The presentation covered the definition of early transfer, why we should proceed with early transfer, the requirements for early transfer, how the community is protected, how long does the process take, previous Navy track on early transfers, and early transfer issues.

Revised Submittal Tracking Table

The submittal tracker was reviewed at the meeting. Gary presented key submittals under review and upcoming documents from CH2M-Jones.

Meeting Recap / Parking Lot / Review Wednesday Agenda

The team reviewed the agenda for the following day and the meeting was adjourned.

Wednesday, September 11, 2002

RAB Debrief

Keith Johns led the discussion. The two topics at this month's RAB meeting were a presentation by Amerada-Hess regarding the status of their remedial operations on their property, which is adjacent to the northern property line of the base, and a presentation by Jeff Meyers from the Navy describing the FOSET (Early Property Transfer) concept. The overall opinion was that the presentations were very good.

Also, on a positive note was the attendance by Board members (6 Community members were present along with Tony, Dann, and Jerry representing the Navy, EPA, and SCDHEC respectively). Lou Mintz stated that an agreement had been reached on the issue of the personal property located within and around the facilities and that the RDA was making arrangements for its dispersement.

Dean indicated that although he respected Steve Freeman (Amarada-Hess) for his knowledge regarding the contamination on their property, he wanted to caution the Team about taking the presentation verbatim. Dean felt that the BCT needs to be careful when evaluating the impacts to the Navy base. SCDHEC indicated that an internal discussion between the CNC and Amerada-Hess teams would be beneficial to understand the pathway forward at each location. Stacy indicated that, based on the data currently available, the Navy would not be responsible for the remediation of the MTBE plume since it appeared it may have originated offsite, which raised the question of who would be responsible for this effort and the required monitoring after property transfer.

Discussion of the Schedule for Permit Descoping

Tony Hunt led this discussion and indicated that his intent was to let the Team know how the Navy was proceeding on this topic and to get some feedback on the relationship between Permit Descoping and the FOSET. Based on the comments expressed at the meeting it was decided that the preliminary schedule would require some revisions and that Tony would reissue it by Friday of this week. Dann stated that the EPA prefers to see the proposed deed language in the FOSET. Tony requested that we table further discussion on this issue until the next BCT meeting, as he wanted to consult with the Navy's legal representatives.

RDA Discussion

Robert Ryan of the RDA was present during this portion of the meeting. Robert confirmed Lou Mintz's statement regarding the release of personal property (equipment) from the Navy and he indicated that the RDA was starting to perform

an inventory. Robert stated that how to transfer the personal property and whether a direct transfer from the RDA to the tenants/lessees was legal were still unanswered questions.

Robert also stated that the City of North Charleston and SPA were still working out the details regarding who would receive what property from the RDA. Tony indicated that the Phase III property transfer was being delayed because the Navy was still working on the language in the Memorandum of Understanding (MOU).

Robert asked about the status of the Brownfield Agreement and Tony stated that it was still being developed but that he expected to request a meeting with the RDA and their major tenants/lessees in the near future where we would present its contents and explain the benefits for all parties involved.

Robert also questioned Tony about what was the latest status of the highway expansion at the Annex. Tony indicated that several public meetings had taken place and that the Navy had provided information regarding the potential impacts to the remedial operations at the Annex. Tony also said that it was his understanding that the property was being excessed as part of the FY 2003 National Defense Authorization Act and that SOUTHDIV was in the process of authorizing the transfer of property to the highway department.

Robert indicated that the plans for the relocation of Avenue D were proceeding and that any specific details on the schedule could be obtained from Sean at the RDA. The Navy provided information to the RDA regarding the abandonment and relocation of several wells, which are within the footprint of the relocation. As to the status of the plan for the construction of a silo by CIP at the SWMU 6/7/635 location, Robert stated that although the design was complete, he did not believe that the SPA would allow it to proceed until the issue of property reuse was resolved. Accordingly, he did not believe that our comments that the remedial operations were not yet complete would be detrimental at this time.

Project Managers Meeting

During the Project Managers session Alan Jenkins of Tetra Tech provided a handout that identified the DOD guidance for early transfer and indicated how the FOSET that is currently being developed would address these issues. It was requested that comments be forwarded to Tony by 9/20/02 in an effort to support the schedule for property transfer. Stacy indicated that she would discuss with SCDHEC management the use of Interim Land Use Controls and how the Department would view the provisions of the FOSET compared to the permit mod.

Jerry Stamps presented an updated Cooperative Agreement for the past year and was requesting concurrence from the Navy that SCDHEC met the requirements that were forecast. Although the exact deliverables may have changed, Tony agreed that generally the effort by SCDHEC appeared to be equal to the forecast. Any adjustments to the funding would be the result of manpower allocations and not a lack of effort on the part of SCDHEC.

Dean asked that, as time progresses and we are into the monitoring phase, if groundwater collected during sampling events was determined to be below MCLs, could the water be poured onto the ground in the area adjacent to the well where it was collected. After some discussion, SCDHEC indicated that it could be possible and they suggested that Dean issue a letter requesting this activity.

Dean asked for some clarification regarding the air monitoring for mercury vapor comments on SWMU 65 (building 3) and it was decided that we would perform some additional air sampling and do a comparison to industrial worker levels as well as residential.

The next BCT meeting will take place in Columbia on October 7,8,9 and Tony will be the coordinator.

Parking Lot/ Action Items

- Comments on the FOSET development due back to Tony by 9/20/02
- Ltr. From CH2M-Jones requesting approval for onsite disposal of clean groundwater and soil samples.

List of Attendees:

U.S. Navy: Rob Harrell, Tony Hunt, Jeff Meyers

USEPA: Dann Spariosu

SCDHEC: Jerry Stamps, Paul Bergstrand, Gill Rennhack, Stacey French, Mansour Malik, and Jack Gelting.

CH2M-Jones: Gary Foster, Dean Williamson, and Richard Garcia (Tuesday Only).

EnSafe: Charlie Vernoy

Tetrattec NUS: Allan Jenkins and Lawson Anderson

RDA: Robert Ryan (9/11/02 only)