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NOTES FROM BASE REALIGNMENT AND CLOSURE TEAM MEETING DATED 11 APRIL  
2001 CNC CHARLESTON SC  
4/19/2001  
CH2MHILL

## Notes from April 2001 BCT Meeting Columbia, SC.

PREPARED FOR: Charleston Naval Complex BCT  
PREPARED BY: Sam Naik  
DATE: April 19, 2001

The April 2001 BCT Meeting was held at the SCDHEC Offices on Farrow Road, Columbia, SC. The meeting began at 10:30 A.M. on April 11 and concluded at 3:00 P.M. on April 12, 2001.

### Wednesday, April 11, 2001

#### Project Managers' Meeting

##### Building 225 tenant relocation

Dean Williamson opened the discussion on the topic of current understanding of the Step Ahead Program on when the tenants of Building 225 will vacate and reoccupy this building as a result of proposed remediation field activities at AOC 607 this year. Dean expressed concern about information published in an article in the Saturday, March 31, 2001 issue of the Post and Courier, a Charleston area newspaper, which quoted a Navy spokesman as saying that the cleanup (at the site) should take about six months. The concern was that the speculation that the cleanup would be performed within six months might mislead the tenants into believing that Building 225 can be re-occupied six months after initially vacating this building. Dean indicated that the preliminary field activities to support the remedial design have just begun and it would be difficult to predict the time required for the remediation effort. Gary Foster indicated that as per his previous conversation with Tony Hunt, the planned date for tenant relocation from Building 225 is still June 1, 2001, preponed from the original date of September 1, 2001.

The project managers agreed that the schedule issue needs to be coordinated amongst the Navy, CH2M-Jones, SCDHEC and the RDA. Mihir Mehta indicated that Keith Collinworth and Bob King of SCDHEC were also in the loop on this issue. Rob Harrell suggested having a coordination meeting with Lisa Belton, the Step Ahead facilitator. Mihir suggested keeping Paul Bergstrand and Keith Collinworth included in this coordination meeting, which is expected to take place during the week of April 23, 2001.

Mihir and Paul Bergstrand asked if the PVC utilities in the area would be affected by the heat generated by the six-phase heating effort. Dean indicated that it is unlikely that the heat will be sufficient enough to affect the PVC utility lines. David Scaturo said that while SCDHEC will provide strong support, the Navy has lead the communication effort with

Step Ahead on the Building 225 issue. He indicated that Keith had had the health assessment section of SCDHEC look at some of the analytical data for AOC 607.

Dean asked SCDHEC for clarification on whether or not the investigative derived waste (IDW) resulting from the field work at AOC 607 would be considered a listed waste by SCDHEC. He asked that since it was originally a dry cleaning operation, would the waste be called a listed waste? David agreed to have the question evaluated by SCDHEC, and suggested that we should evaluate the situation once the drums containing the IDW are sampled and we get the analytical results for the IDW. He suggested that we should provide a copy of the analytical results to SCDHEC for evaluation of the options for waste disposal. Stacey French indicated that we should consult the RCRA Remediation Waste Guidance document and that this could clarify appropriate methods for addressing this issue.

#### **Interim Measure at AOC 518 (former Coal Storage Bin area in Zone C)**

Dean proposed conducting pre-excavation soil sampling to delineate the extent of lead contamination in both surface and subsurface (2 to 3 ft bls) soils requiring excavation at AOC 518 in Zone C. This approach would entail delineating the lateral and vertical extent of soil contamination with soil borings and would allow the excavation boundaries and depth to be established prior to soil removal. Any obvious presence of coal-like or waste material observed in the excavation floor would also be removed and the excavation area would then be backfilled with clean soil. The goal would be to accomplish small dig and haul clean-ups of this type in a single day. This would avoid the excavation getting water-logged due to a rain event while the excavation remains open awaiting confirmatory soil sampling results, thereby also avoiding unnecessary generation of wastewater as well as the need to remobilize heavy equipment. It also is less disruptive of tenant activities at these sites. David agreed that it was a good approach. Stacey French added that she has seen this done before at other DOD facilities on a routine basis.

#### **RFI Closeout Process**

Dean expressed concern that the directions of the Executive Sponsor Team (from its August 30, 2000 meeting) on the streamlining of the RFI process has not filtered down to the RFI Work Plan Addendum review process, especially with specific reference to item 2 of the meeting minutes from the Executive Sponsor Team meeting (a copy of page 1 of the meeting minutes was handed out to the team by Mihir). Mihir indicated that SCDHEC has had an internal discussion on how to estimate the costs of an industrial versus residential future land use. Dean suggested that this was a question that the Executive Sponsors had tasked the Tier I team with to arrive at a solution. The group agreed that this would need to be resolved on a site by site basis, preferably during the RFI completion scoping activities.

Dean illustrated the scenario where we would have several small parcels of land cleaned up to residential (unrestricted) land use in the middle of a large area expected to have industrial land use, and added that there was need for a policy interpretation by SCDHEC on such situations. David reminded the team that the Executive Sponsors directed that the Navy and CH2M-Jones will decide what is residential and what is industrial, and SCDHEC will accept it. Stacey asked if SCDHEC has a copy of the zoning maps. Dean indicated that

two copies had been furnished to SCDHEC and that it was also included in the ArcView GIS.

Dann Spariosu added that the USEPA thinks that deed restrictions are a more effective mechanism than mere zoning to enforce land use restrictions. He also added that land use restrictions will be enforced by the Navy, therefore decisions about future land use restrictions are the Navy's.

Stacey suggested that the CMS reports should state what the Navy's desire is for land use controls and provide a cost comparison and justification on restricted land use versus unrestricted land use. Mihir added that SCDHEC is taking into consideration the scenario where some Zone F sites are to be considered for industrial land use, and that he has instructed Susan Peterson and Mansour Malik to keep this in mind while reviewing the Zone F reports.

David indicated that he wants to focus on specific sites where the RFI completion process is stalled, and wants to bring in the appropriate SCDHEC and CH2M-Jones staff members for a meeting to see where the bottlenecks are.

### **Cooperative Agreement**

Mihir handed out copies of the Cooperative Agreement schedule signed by Tony Hunt and Mihir, and suggested that the milestones in the table need to be reality-checked by the team. David suggested that SCDHEC should take this issue up with the Navy, not with the Navy's contractors. The team agreed to make this an item for discussion at the May BCT meeting.

### **Arsenic and Other Inorganics in Groundwater at CNC**

The team was joined by telephone by Dr. June Mirecki, Associate Professor of Geology at the College of Charleston, SC. Dr. Mirecki had earlier provided to the team a summary of her findings from a study conducted by her on the levels of arsenic in groundwater wells basewide at CNC, as well as from some nearby sites outside CNC. She summarized her findings by saying that the pattern of arsenic distribution at CNC was very common amongst different scenarios of data evaluation. She pointed out that there were some wells which consistently showed high arsenic levels, but the number of those wells at CNC was very low. Dr. Mirecki highlighted the distribution of groundwater arsenic concentrations in three ranges of concentrations 0-20 µg/L, 20-50 µg/L and >50 µg/L, with the idea that the 20 µg/L could be a feasible/possible new MCL for arsenic in groundwater. To a question on whether a temporal distribution of arsenic concentrations was done, Dr. Mirecki indicated that there was too much data to perform such an analysis in a short period of time. She also indicated that the data points were not averaged over time at each well, but were single-event data points. She also indicated that often, the presence of organic material can create a low redox condition that brings naturally-occurring arsenic that is bound up in iron hydroxy minerals into the dissolved phase. This arsenic may be mobile as long as the redox is low but becomes bound into the soil matrix when redox levels increase. Dean indicated that this condition had been observed at a number of fuel-release sites in Florida, due to action of iron-reducing bacteria.

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The phone call was followed by a presentation by Vijaya Mylavarapu on the distribution of concentrations of arsenic and other inorganics in groundwater at CNC. The presentation showed that the pattern of distribution of inorganics concentrations was similar between the grid wells (which indicate background concentrations) and site wells. Vijaya suggested mapping total dissolved solids (TDS) and total suspended solids (TSS) contours basewide for a comparison with the distribution of inorganics concentrations. Paul Bergstrand suggested looking at arsenic behavior in oxidative/reductive conditions.

The team agreed that a decision needs to be made quickly on how to deal with the inorganics in groundwater issue. Stacey suggested that this be looked at the site-specific level and that an argument be presented in the reports to explain the occurrences of inorganics. She suggested condensing Vijaya's presentation into words and using the text in the reports. It was agreed that those sites where there are consistently high concentrations of inorganics can be looked at more closely to explain the concentrations.

### **EPA Region IV Memo on Arsenic in Surface Soils**

The team was updated on SCDHEC's internal discussions on the EPA Region IV memo on cleanup goals for arsenic in surface soils. Mihir indicated that SCDHEC's position is that it would technically be more defensible to have a reasonable range of arsenic concentrations to compare the site-specific concentrations to, rather than a single number as a cut-off level. Stacey added that the soil arsenic concentrations at sites should be explained in the same manner as the arsenic concentrations in groundwater. She added that there should be enough information from the background dataset to compare with site-specific arsenic levels and to make a management decision. Susan Byrd suggested that at sites that lie near zone boundaries, there should be consideration for data from areas within a certain distance from the site even if a zone boundary is crossed, since the zones are only an arbitrary demarcation. Vijaya expressed concern that using a range of values and not having a threshold number to dictate cleanup decisions at sites would present vagueness to site management decisions. Dann agreed with this concern. Susan Byrd and Stacey added that an argument needs to be presented in reports as to why a threshold number is justifiable at a site based on basewide background concentration ranges at CNC.

### **Discussion on the Revised Technical Memorandum on SSLs**

The team heard SCDHEC's comments on the *Revised Technical Memorandum on Approach to SSLs at CNC* prepared and initially provided to the team by CH2M-Jones during January 2001 and revised in March 2001. Mihir provided a process document prepared by SCDHEC that contained flowcharts for screening site contaminants against background ranges and SSLs. Stacey mentioned that this flowchart was being followed at virtually all DOD installations in South Carolina. Mihir explained that the main difference between the CH2M-Jones approach to SSLs and SCDHEC's flowchart approach was that in SCDHEC's process document, the weight of evidence considerations and comparison to background values were applied prior to performing a site-specific DAF calculation. Stacey pointed out that the flowchart shows several opportunities for site management decisions where considerations of SSLs, background ranges and risk management decisions could be exercised.

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Paul Favara said that an SSL calculation with a DAF of 10 is a good starting point to quickly see if a site passes the SSL test. If site contaminants are screened out using a DAF of 10, then further screening and weight of evidence considerations are not necessary, especially if the contaminants are not also found in the groundwater at the site. Susan Byrd said that the SCDHEC flowchart relies on the range of background concentrations and that once the site contaminants are shown to be within the range of background, then SSLs do not come into the picture. Dean asked what SCDHEC's understanding of the term "background" was. SCDHEC indicated that it could include the range of values found, not simply a single value.

David suggested that in each document where the site contaminants need to be compared to the SSLs, an SSL calculation using the DAF of 10 approach proposed by CH2M-Jones should be included, and that SCDHEC would look at approving the CH2M-Jones technical memorandum on SSLs. Dann added that an approval of this approach would streamline the process. Dean suggested that SCDHEC could attach the SCDHEC process memorandum (with the flowcharts) and attach it to the CH2M-Jones memo on SSLs and approve this memo. Stacey agreed that this was a good idea. Vijaya suggested that a simultaneous examination of the SCDHEC flowcharts and the CH2M-Jones approach (with a DAF of 10) could be made during the contaminant screening process. Mihir indicated that prior to approving the CH2M HILL SSL memo, he would like to have further internal discussions.

#### **Pavement Infiltration Rate for use in DAF calculations**

Mihir mentioned that SCDHEC does not recommend a blanket reduction of infiltration of recharge (precipitation) due to the presence of paved areas at sites. Paul Favara pointed out that the generic DAF calculation is not affected by the infiltration rate. David said that SCDHEC is willing to consider a reasonable explanation of infiltration reduction due to the presence of paved areas, and added that the site management points provided for in the SCDHEC flowcharts are meant to facilitate such justifications. He added that if there are not a lot of sites with paved areas, we should evaluate these sites on an individual basis rather than trying to come up with a basewide rule. Vijaya asked if SCDHEC considers existing buildings as potential barriers to infiltration as well.

Dann said that in the end, the main considerations are whether there is a contaminant source in the subsurface soil and whether there is groundwater contamination now or potentially will be in the future, as a result of soil contamination. David said that SCDHEC had no major problem with using DAF of 10 approach to the SSL calculation, but that the issue needs administrative input.

#### **SWMU 17 CMSWP Comment Resolution**

Dean mentioned that the response to comments on the SWMU 17 CMS Work Plan were being drafted and will be presented to SCDHEC shortly. He added that some of the comments on the CMSWP refer to perceived data gaps in the contaminant nature and extent characterization as presented in the Ensafe Zone H RFI Addendum of May 2000. Sam Naik explained that the nature and extent of contaminants for the scope of the RFI was essentially complete. He explained that the main concern that SCDHEC reviewers had was that there were open-ended contours in the figures included in the RFI Addendum, but this does not

represent incomplete characterization of contaminants at the site. He added that the figures show two different sampling events, one in July 1998 and another in December 1999 for several constituents and the results from these two sampling rounds should be considered simultaneously. He pointed out that considering that the fuel spill occurred in 1987 and the transformer fluid leak occurred in 1984, there is no indication that site contaminants have migrated far from the spill locations in the 14-17 years since the spill, and considering the chemical migration rates at this site to be very small, it is unlikely that site conditions would have changed significantly in the 17 months elapsed between the July 1998 and December 1999 sampling events, particularly given that the estimated contaminant migration rate at the site was less than one foot per year.. Further, 4-5 rounds of sampling from the wells in the downgradient direction (approximately 100 feet north of the site) have consistently shown that the contaminants have not migrated to these well locations over the last 5-6 years.

Mihir asked for a figure that shows the summary of site contaminants per media at this site. Dean pointed out that those figures are already included in the Ensafe RFI Addendum and showed the figures from a copy of the RFI Addendum. Mihir indicated that if copies of those figures are included in the SWMU 17 CMS Work Plan, they would complete SCDHEC's understanding of the contaminant nature and extent determination. Paul Bergstrand indicated that it was not SCDHEC's responsibility to close the open-ended contours in the RFI Addendum. Sam Naik indicated that CH2M-Jones does not expect SCDHEC to close the contours, but has agreed in the scoping meeting held in January 2001, that the figures in the RFI Addendum will be edited to represent the results of the July 1998 and December 1999 groundwater sampling events more clearly.

The team agreed that further discussion on specific comments on the SWMU 17 CMSWP would be conducted during the following Monday morning team call.

## Thursday, April 12, 2001

### Agenda and Introductions

After introductions and agenda review, parking lot items were reviewed. Paul Bergstrand expressed a need for the team to undergo training in team building. Mihir said that there is a need for the team to come prepared to the table to make decisions. He added that there is frustration among team members that decisions are not being made on issues.

### Pathway Forward for CNC Sites

Vijaya made a presentation that showed a general grouping of sites based on their pathway forward. Three general types of sites ready for NFA are :

- Sites with no exceedance of contaminant concentrations above background or RBC values (no COPCs or COCs) (e.g., SWMU 43)
- Sites with few exceedences, however within range of background concentrations and below the RBCs (HI=1.0) (COPCs only, no COCs) (e.g., SWMU 47, AOC 506)
- Sites with localized exceedences (limited COCs) (e.g., SWMU 2, SW,U 14).

This pathway forward is based on the nature and extent of contamination at these sites, and accordingly the most suitable and efficient method of remediation. She explained that the grouping of these sites takes into consideration that the sites are ready for risk-based corrective actions following EPA guidelines or for interim measures (IMs) involving focused removal actions. She explained the concept of an exposure unit, UCL 95% and EPCs (exposure point concentrations).

#### **SWMU 44 Risk-Based Corrective Action**

Paul Favara made a presentation on the risk-based corrective action at SWMU 44 in Zone C. Paul explained that the approach for corrective action would be with an IM to excavate soil contaminated with arsenic to levels that would allow unrestricted land use. A 20 mg/kg exposure point concentration would be the target concentration for cleanup. He explained that other contaminants (BEQs, aluminum, beryllium and thallium) were detected infrequently at the site and would not warrant further action.

Paul explained that the first step was to evaluate the EPCs for the entire SWMU and to see which sample locations cause this UCL-95% for the site to exceed 20 mg/kg. Sampling locations would be successively removed starting with the most contaminated location until the UCL-95% for the SWMU is brought below 20 mg/kg.

The second step would involve examining several 1/2-acre parcels within the site and looking at the EPC for each of these 1/2-acre parcels within the SWMU. Vijaya explained that this additional step goes beyond what is typically required under risk-based cleanup but that we had applied it to provide a safety factor, given that the site is zoned for some potential future residential use. Paul employed the EGIS to show the evaluation of several 1/2-acre parcels of land which encompassed groups of soil boring locations exhibiting the most contaminated groups of sampling locations. The approach would be to successively remove sampling locations that cause the 1/2-acre parcel containing these locations to exceed the EPC of 20 mg/kg. The assumption would then be made that these excavations will be backfilled with soils having an arsenic concentration of one-half the arsenic background concentration (which would be equal to 7 mg/kg). This method of selecting the sampling points that need to be removed would provide the areas of excavation within the SWMU. Paul presented estimations of soil excavation quantities based on depth of excavations for different areas.

#### **Combined SWMU 14 Focused Removal Action**

Sam Naik made a presentation on the nature and extent of contamination at Combined SWMU 14 which includes SWMU 14, SWMU 15, AOC 670 and AOC 684 in Zone H. He summarized the findings of previous investigations at the site which included a 1992 geophysical survey that identified 34 subsurface anomalies, the Ensafe RFI, a 1997 geophysical survey by the Navy Environmental Detachment (DET) which identified 25 additional subsurface anomalies and a 1998 lead shot investigation by Ensafe. He showed a table of findings from the excavation of the 59 anomalies by the DET which showed that with the exception of one anomaly at the site (Anomaly G), 58 of the 59 anomalies were due to buried construction and demolition debris. Anomaly G was found to be buried containers of DANC, which is a decontamination agent made of chlorinated organic compounds. The footprint of the DANC excavations, and the location of monitoring wells installed in the excavation footprint and downgradient directions was also presented.

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Sam summarized the extent of contamination to be limited to surface soils only and showed that there were no groundwater contaminants of concern (COCs). There was minimal subsurface contamination (for antimony in a few locations), and the surface soil contamination resulted from BEQs, arsenic, antimony and lead. A total of 37 soil sampling locations were candidates for focused surface soil excavations which would entail removal of soil around individual sampling locations that show the presence of surface and subsurface soil COCs.

### **SWMU 1 / SWMU 2**

Dean presented a summary of previous investigations at SWMU 1 (former DRMO yard used until the early 1990s) and SWMU 2 (former battery disassembly area operated from the 1960s until 1984). Previous field activities included RFIs by Ensafe and ESE, and an IM conducted by the Navy DET. The DET IM involved excavation and disposal of approximately 8,300 tons of debris and contaminated soil and removed most of the soil contamination. Confirmation sampling at the end of the IM indicated that cleanup objectives had been met. Risk from residual lead contamination is being evaluated. There are no subsurface or groundwater COCs identified. Alternatives for pathway forward include NFA or a limited spot excavation of surface soils where the key COC is lead.

### **Breakout Sessions**

#### **Zone K Clouter Island Scoping and Zone J Work Plan Approach**

Steve Parker presented the Clouter Island investigation scoping approach, pathway forward and site-specific SSLs.

Todd Haverkost conducted a discussion on the Zone J Work Plan scoping approach.

A summary of the meeting minutes covering Steve's presentation and Todd's discussion is attached to the meeting notes (*Clouter Island and Zone J notes.doc*).

#### **Zone F RFI Work Plan Addendum Comments**

The Zone F RFI team discussed the issues related to the Zone F RFI Work Plan Addendum in a breakout session. Minutes from this meeting will be separately distributed to the team.

### **Project Progress Review**

Gary Foster summarized the status of project deliverables and indicated that over 30 documents had been generated by CH2M-Jones so far, about 12 of them are in-house at SCDHEC at this time, and 15-16 documents are expected to be submitted by CH2M-Jones during April and May 2001. Mihir asked that documents be assigned priorities to which Dean suggested that the starting points would be the RFI Work Plan Addenda which drive the RFI fieldwork. Gary suggested that resolution and closure of sites in Zones A and C (and in other zones) which would allow a quick transfer of land parcels for redevelopment would warrant prioritization as well. He indicated that CH2M-Jones staff working on the FOST is currently at CNC and will continue to conduct site visits over the Spring and Summer of 2001.

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## Parking Lot Items

### SWMU 25/70 Fieldwork Coordination Issues

Jack Gelting(SCDHEC) joined the BCT during the afternoon session and indicated that he had an internal report that presented a list of issues relating to field work performed the week of April 2, 2001 following the SWMU 25/70 Interim Measures Work Plan Revision 1 (January 2001). Jack indicated to the team that the issues identified resulted from a report of the field visits to CNC prepared by Mansour Malik(SCDHEC) and include the following:

- Inadequate coordination of field work with SCDHEC personnel by CH2MHill against previous agreements made with the BCT;
- CH2MHill's subcontractor displayed unacceptable performance while recovering acetate sleeve cores;
- Incomplete or improper grouting of boring locations;
- DPT groundwater sampling did not follow the approved IMWP; and
- general lack of appreciation of Mansour Malik's effort and time spent on the site visit.

Tom Beisel (CH2MHill) stated that he was the CH2MHill geologist on-site with Mansour and that he was supervising the field crew with the help of CH2MHill's field team leader Darryl Gates.

Tom reminded Mansour that he had been in contact with Mansour and Paul Bergstrand the previous two weeks, constantly updating them of changes to the scheduled field work. Tom told the BCT that he was in contact with Paul Bergstrand the week before because Mansour was out of town and unavailable for several days. Tom agreed there were issues with the slow performance of CH2MHill's subcontractor during the first two days of field work. However, all performance issues were rectified by the subcontractor on the third day of field work at the insistence of CH2M Hill when Mansour was unable to visit the site. Tom pointed out that the subcontractor's slow performance was a contractual issue between CH2M Hill and its subcontractor and not SCDHEC's responsibility.

Mansour stated that CH2MHill should not have recovered the remaining cores without the presence of SCDHEC. Paul Favara reminded the BCT that the agreement was made at the BCT for CH2MHill, only to coordinate with SCDHEC on the issue of where to collect groundwater samples and that approval or close monitoring of any facet of field work by SCDHEC staff was never intended nor required. Tom asked the BCT whether CH2MHill should be expected to stop work to wait for SCDHEC's presence during field work. Jack Gelting commented that CH2MHill could not be expected to alter their field work to accommodate SCDHEC staff and that such expectations were unreasonable.

Tom added that him and Mansour did observe and discuss the acetate core collected on Tuesday (April 3) and that they together agreed on the most appropriate lithological zones for sampling. Mansour said that he left the site to return to Columbia, SC on Tuesday afternoon. Tom pointed out that had Mansour stayed in the field another day, he would have seen all the acetate sleeve cores collected after the subcontractor rectified field

performance issues. Tom stated that all the acetate cores were properly recovered. Tom indicated that all borings were grouted properly with a tremie pipe and that proper sampling procedures were followed for the DPT groundwater sampling.

In closing, Jack Gelting was asked for his assessment of the issues after the above information had been discussed. Jack acknowledged that:

- 1) he believes SCDHEC's presence in the field is appreciated by CH2M Hill ,
- 2) CH2MHill cannot be expected to revise their field work schedule to accommodate SCDHEC staff schedules, and
- 3) SCDHEC cannot be expected to make real-time decisions in the field.

David Scaturo added that the discussion reiterates the fact that field performance and adherence to proper procedures is very important to generate accurate and reliable data for decision-making. Paul Favara asked if SCDHEC had recognized any deviations from the approved work plans by CH2MHill's field crew at the present time that would raise SCDHEC's concern about the quality of data resulting from CH2MHill's field activities. SCDHEC did not provide any specifics in response to this question. Tom added that it is important to note that CH2MHill recognizes as much as anyone else that the quality of its fieldwork affects its own design efforts.

#### **SWMU 47 CMS Work Plan – Rationale for NFA**

Mihir asked what the pathway forward was to resolve the issue of the two hits of BEQs in surface soil above the basewide threshold of 1304 µg/kg. He asked if the two locations could be resampled. Dean asked for clarification on whether the team knows what specific decisions would be made based on outcome of resampling, -and that it is possible that resampling will provide similar results as the existing data. David suggested waiting to see the results of the recent sampling conducted along railroad tracks at CNC. Vijaya indicated that these results should be ready after data validation in about a month, but that the locations with the highest PAH values could be looked at quickly to assess the upper part of the range.

#### **AOC 518 CMS Work Plan – Rationale for NFA**

Mihir expressed SCDHEC's concern that at this site, the groundwater monitoring well was far away from the AOC and the subsurface contaminants were of concern, and that the IMWP did not address Susan and Mansour's other comments. Dean said that the IMWP was only intended to address the comment regarding the lead-impacted soil and that he would prepare draft written responses to the other SCDHEC comments within a week or two. Susan Peterson suggested that their concerns can be addressed with an adequate response to comments on this document. She added that the CMS Work Plan is otherwise acceptable to SCDHEC.

#### **SWMU 17 CMS Work Plan – Indoor Air Quality Issue**

Vijaya indicated that a comparison of maximum contaminant concentrations with the indoor air criteria showed that there was no indoor air quality problem at SWMU 17 from

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site contaminants. She asked Dann where the EPA Region IV office review of this information stood. Dann indicated that he will discuss it with the risk assessors at USEPA. The team agreed to discuss this further during the Monday morning team calls.

### **Partnering Training for BCT**

David said that the USEPA is conducting a partnering training in Charleston next month, and another option could be for the team to attend the RCRA Corrective Action training provided by the USEPA.

### **May 2001 BCT Meeting**

It was decided that the next BCT meeting would be held May 7, 8 and 9, 2001. The next RAB meeting is on May 8, 2001.

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