NOTES FROM BASE REALIGNMENT AND CLOSURE TEAM MEETING DATED 27 FEBRUARY 2001 CNC CHARLESTON SC

2/27/2001

CH2MHILL

Meeting Notes for February BCT

PREPARED FOR: Charleston Naval Complex BCT

PREPARED BY: Paul Favara

DATE: February 27, 2001

The January BCT started at 1:00 PM on February 12, 2001 and concluded at 5:00 PM on Tuesday, February 13, 2001. A Project Manager's meeting was held the morning of February 14. Notes from that meeting are contained in a separate file.

Meeting Highlights

Building 225 Analytical Results Summary

Air, soil gas, and groundwater sample results collected at Building 225 were discussed. The data confirms that, while residents are not currently at risk, they will not be allowed to remain in Building 225 while remediation is conducted, due to the high levels of VOCs detected in shallow groundwater at the building's edge.

DAF of 10 for Metals when Calculating SSLs

CH2M-Jones presented an argument to support the use of a DAF of 10 for metals when calculating SSLs. David Scaturo recommended that CH2M-Jones prepare a white paper to document the basis of using a default of 10 for DAF.

SWMU 17 Subsurface Soil SSLs for PCB

SCDHEC is open to the idea of developing site-specific SSLs to develop media cleanup standards for PCBs at SWMU 17. SCDHEC also agreed that some site-specific conditions, such as the presence of large buildings likely to remain in-place in the future, may be factored into estimating the SSL.

Use of 20 mg/kg Residential Cleanup Level for Arsenic in Soil

CH2M-Jones reported that EPA Regions IV and IX have accepted a residential arsenic level of 20 mg/kg (i.e., a risk level of 1E-04) and stated the basis for this level. SCDHEC said they were open to considering such a level at CNC and requested that CH2M-Jones provide a white paper to support the use of such a level. SCDHEC also commented that because acceptance of this level could be precedent setting in South Carolina, a high level review (in the department) of the number would be required.

Acceptable Risk-Range for No Further Action

During the discussion of arsenic in soil, David Scaturo said that a site could be considered for NFA (i.e., no land-use controls) if the risk was greater than 1E-06 (i.e., in the risk-range of

1E-06 to 1E-04) provided that supporting information to justify the higher level of risk was agreed upon.

Monday, February 12, 2001

Action-Item Update

The BCT went through action-items from January 2001 BCT Meeting. See attached action-item list for updates to previously open items as well as new items the BCT added to the list.

Building 225

Tony gave the BCT an update on the housing status for residents at Building 225. The RDA has offered up a new residential area (five duplexes) that don't require as much renovation as the previous site offered to the residents. The Step Ahead program will give the Navy a transition plan by the end of this week - the plan will detail options for temporary and permanent housing. After the Navy has reviewed this plan, they will make a decision on whether or not to extend the license for residents to stay at Building 225 past March 15. Tony indicated that it was probable that the license would be extended.

The technical memorandum which addressed results of air, soil gas, and groundwater sampling at Building 225 was discussed. The data confirms that, while residents are not currently at risk, they will not be allowed to remain in Building 225 while remediation is conducted, due to the high levels of VOCs detected in shallow groundwater at the building's edge.

Gary Foster briefed the BCT with his RAB presentation for Building 225. The BCT offered comments to the handout that would be provided to attendees of the RAB meeting and the key talking points for the presentation were discussed.

Zone J and Iron

A sub-group will be formed to address Zone J drivers, including iron. Collecting appropriate data will support development of site background values. Ensafe will propose a sampling plan for the sub-group's review.

Zone G Sites

Tony provided an update for several Zone G sites:

SWMU 10 - This site was a regulated unit and was closed in accordance with the closure plan. A closeout letter was provided by SCDHEC, but some questions remain regarding NFA and the closure plan content, and type of sampling performed. SCDHEC and Navy personnel will both check their files for the closure document.

AOC 646 - this AOC was NFA'd previously in a team meeting (February 1999). BaP was the driver, but the detection was below the detection limit. Susan Peterson and Monsour will look at this site to determine if further action is warranted. The Zone G scoping package will be revised to reflect this change.

AOC 631 - Tony will provide a letter to SCDHEC discussing process activities at AOC 631 and recommend that the activities conducted on the pier be included as part of Zone J and that portion of the AOC on land continue to be included as part of the Fuel Distribution System (i.e., RCRA Subtitle I UST Program).

AOC 633 - This AOC had been designated as an IM to be completed by the DET. However, Tony recommended that this site be taken over by CH2M-Jones. Tony will send a letter to SCDHEC indicating that this site will included as part of Zone G. SCDEHC suggested that additional sampling should be done, and it can be done in conjunction with the IM to investigate the PCB transformer storage area that was not previously investigated.

Building 177 - Tony addressed one of several concerns SCDHEC had at Building 177. Tony provided an operational summary of the site under Navy and tenant uses. When the Navy was operating in the building, the catch basin was used to collect a iridite solution (not oil) before it went to the sanitary sewer. The Navy notified the existing tenant to cease using the catch basin, remove the catch basin and contaminated soil, and install a proper catch basin that will properly catch oil, if they intend to continue using it.

Mihir questioned how the work will be completed (e.g., work plans, reports).

Tony will provide a status of Building 177 on the February 26 conference call.

Health and Safety

Gary Foster presented a safety video to the BCT. All CH2M-Jones subcontractors will be required to view the shown safety video before working on site.

Tuesday, February 13, 2001

Impact of New Arsenic MCL on project

Paul Favara discussed the impacts the new arsenic MCL had on developing SSLs for soils. CH2M-Jones questions the practicality of developing an SSL based media cleanup standard for a site where background groundwater already exceeds the current MCL (i.e., developing an SSL that would protect groundwater to a background level which is higher than the MCL would not allow the water to be consumed).

Mihir Mehta requested that Paul Favara outline the major points in a memorandum and SCDHEC will address it.

Zone F (Building 68) SWMU 36 and AOC 620

The RDA plans on demolishing Building 68. Future plans may involve demolition of Buildings 69 and 1824. Tony Hunt provided an overview of contamination at the site. An isolated area of high lead concentrations was highlighted. SCDHEC commented that PCB transformers had been located in this building, and were not identified until the most recent walk-through. A note was made that Louise Palmer needed to be made aware of an IM that the DET completed on sewer lines at this site.

The RDA (Robert Ryan) questioned if the site could be demolished. Susan Peterson said that she thought this site was being targeted for additional sampling in the Zone F RFI Work Plan Addendum. The building is a slab on piles. The demolition plan calls for removing the building and floor and cutting the piles of below ground surface.

Paul Bergstrand commented that the building housing the Hunley was close-by and, although this area is considered industrial, we should be aware that children could be in the area as they wait to tour the attraction.

Options for orchestrating the sampling, interim action, and demolition were discussed. Tony Hunt will write a letter to SCDHEC indicating the planned activities at this site. Also, the BCT should define how much time they need to complete their work and the feasibility of completing an IM at the same time demolition is being conducted - this information would be relayed to the RDA so they can plan their demolition activities.

Robert Ryan completed this discussion topic by highlighting future plans the RDA had at the complex.

Land-Use Control Management Plan

Mihir Mehta passed out SCDHEC's process for implementing a Land-Use Control Management Plan (LUCMP). Mihir said that the goal for the BCT is to have this process in-place prior to implementing the first corrective action which uses land-use control plans. SCDHEC would also like to see this incorporated as part of the RCRA permit. For example, a table should be added to the permit that highlights the remedies that incorporate LUCs.

The SCDHEC process is based on other LUCMPs used at other sites in South Carolina as well as EPA guidance.

Mihir Mehta will forward the Navy a copy of the Shaw AFB example where LUCs have been integrated into the permit.

SSLs

Vijaya Mylavarapu provided a presentation (see attached). CH2M-Jones requested that SCDHEC consider using a DAF of 10 for inorganics as an initial screening level because site specific information is not available for all sites. Further, many of the site-specific SSLs developed so far are within the range of background data, and it would be inappropriate to regulate naturally occurring inorganics within the range of background values as COCs. David Scaturo recommenced that CH2M-Jones present a basis of using a default DAF of 10 and a process for addressing SSLs in a white paper that could be appropriately reviewed by SCDHEC staff.

SWMU 17

The current SWMU 17 CMS Work Plan does not address MCSs for subsurface PCBs. SCDHEC indicated that they are amenable to a leachability based MCS for PCBs in subsurface soil. Vijaya recommended that we develop a MCS based on subsurface leachability. SCDHEC agreed that they are amendable to developing a site-specific SSL. David Scaturo and Mihir agreed that some of the site-specific conditions, such as presence

of large buildings likely to remain in-place in the future, may be factored into estimating the SSSL.

MCSs for Arsenic in Soil in Residential Areas

Vijaya commented that EPA Regions IV and IX have accepted a residential level of 20 ppm for arsenic in soil. This value corresponds to the 1E-04 risk level. The industrial level is 270 ppm and is based on an HI of 1. EPA justified a level at the higher end of the risk range because the arsenic identified at sites is less bioavailable than that estimated in the risk and HI calculations. The proposed 20 ppm level is also relevant because the elevated background concentrations are generally observed in most soils. Stacey French indicated that because this proposed target concentration was new (unprecedented) to SCDHEC, a written proposal of the approach and justification should be submitted for SCDHEC's consideration. As per Stacey, the decision to approve these levels would be made at a level higher than those present at the meeting.

David Scaturo stated that as long as a risk level higher than 1E-06 could be justified, land-use controls would not be necessary where MCSs were in the 1E-06 to 1E-04 risk range.

It was recommended that CH2M-Jones present a paper to support using the 20 ppm level. Also, it was requested that CH2M-Jones provide contact names in the EPA regions which have adopted the higher arsenic level so SCDHEC staff can contact them to discuss.

Susan Byrd said that, due to freedom of information act issues, RFI currently scoped to characterize to 1E-06 or background should proceed on that path.

This topic concluded with the agreement that Vijaya would prepare an outline of what the paper will present, and contact Pam, Susan (SCDHEC) and Ted Simon (EPA) to discuss prior to moving forward.

Mihir Mehta said we still need to discuss the impact of such a decision on characterization issues.

Wrap-up Reports from Breakout Sessions

The SWMU 9 breakout team reviewed maps and historical aerial photos. After that, they walked the northern boundary of SWMU 9. It was concluded that the CMS would propose a limit of the northern boundary of the SWMU 9 landfill. This would likely be presented as an appendix to the CMS.

The PAH breakout team visited the Zone K Annex and railroad tracks on the main base. Sampling approaches and locations were agreed upon. The existing sampling plan (memo) will be updated according to agreements reached.

The Zone G breakout team discussed subjects that would lead to finalization of the scoping package for the Zone G RFI Work Plan Addendum. The scoping package sites, data tables, maps, and general format were reviewed and agreed upon. The RFI NFA sites were discussed, as were other sites whose status Monsour Malik had questioned, including: AOC 631 (will be addressed under Zone J RFI and UST program); SWMU 10 (SCDHEC provided a closure approval letter, but SCDHEC still has concerns about the closure plan, and what type of confirmatory sampling was previously performed); AOC 634 (flammable storage

locker, proposed for NFA) Susan P. to ask Stacey French if SCDHEC had concurred on this; AOC 633- found and reviewed two IM sampling documents in Navy files, not previously provided, to determine further IM/RFI actions for PCBs on soils.

Closing

Next meeting Mar 12-14. RAB is scheduled for March 13.