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MINUTES FROM 20 MARCH 1994 ORLANDO INSTALLATION RESTORATION
MANAGEMENT MEETING NTC ORLANDO FL
3/20/1994
ABB ENVIRONMENTAL

March 20, 1994

MEMORANDUM FOR THE RECORD

From: Philip Georgariou

Subject: NTC, Orlando Installation Restoration Management Meeting

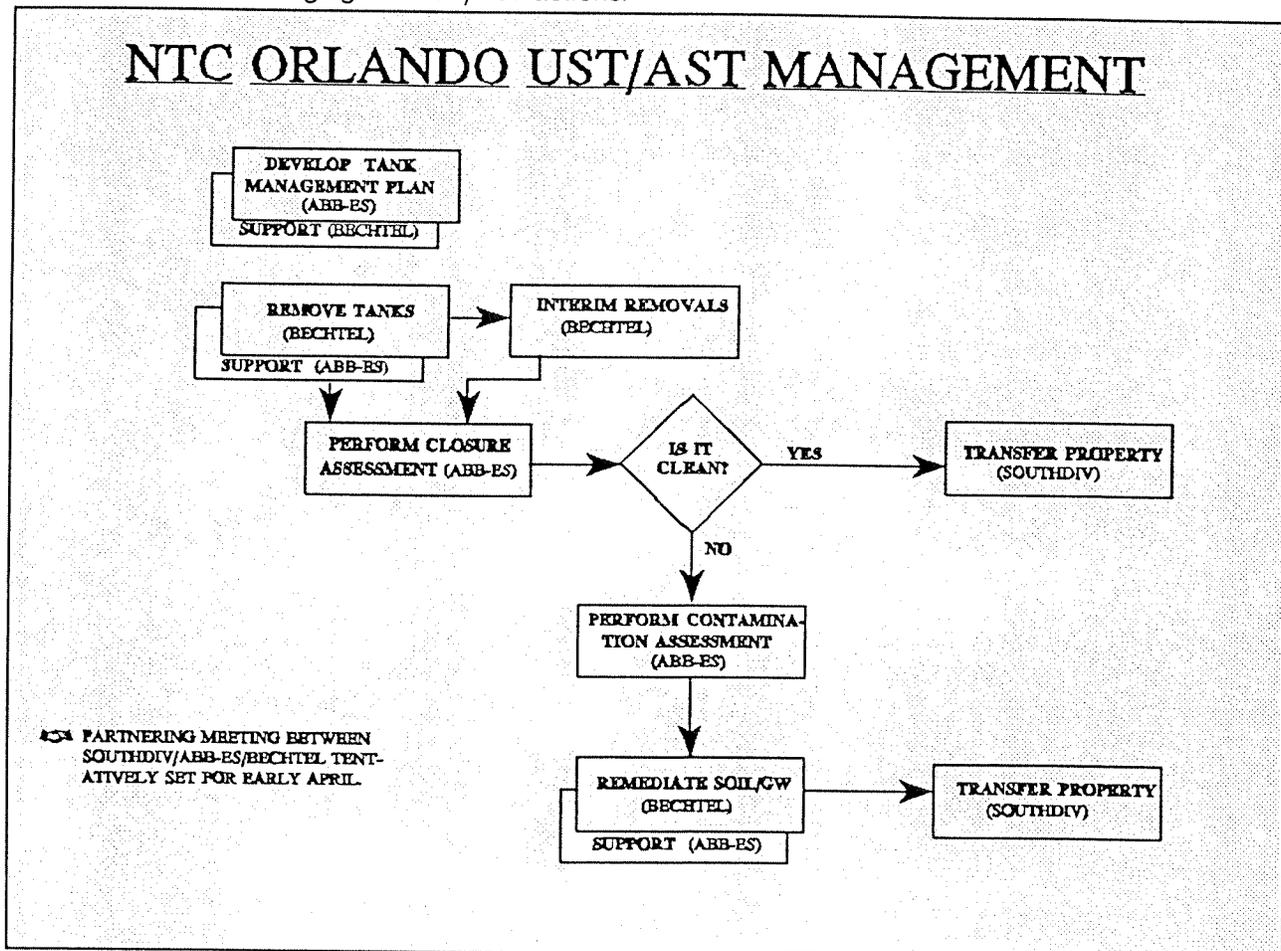
This three day meeting covered virtually all aspects of NTC, Orlando's Installation Restoration (IR) program. The first day dealt with the Installation's vast under/above-ground storage tank program. The second and third day were focused on non-tank environmental issues, as well what additional contractual issues were required to get the IR program underway. The following represent the issues discussed, conclusions reached, and agreements made.

UST/AST Program Meeting (March 15th)

Attendees: Steve Smith (NTC, Orlando, PWD)
Dan Roberts (NTC, Orlando, PWD)
Brenda Bowman (SouthDiv, RCRA)
Dwight Cargyle (SouthDiv, Contracts)
Harry Doo (SouthDiv, Operations)
Billy Drawdy (SouthDiv, BRAC)
Bob Harvey (SouthDiv, Contracts)
Jim Reed (SouthDiv, BEC)
Robert Rivers (SouthDiv, Contracts)
Barbara Robinson (SouthDiv, IR)
Luis Vasquez (SouthDiv, UST Program)
David Clowes (FDEP, RPM)
Craig Brown (USEPA, Region IV, RPM)
Philip Georgariou (ABB-ES, BRAC Project Manager, Orlando)
Jack Pittman (ABB-ES, UST Program, Tallahassee)
Tracy Stenner (ABB-ES, IR Program, Wakefield)

Harry Doo and Bob Harvey gave a short brief on SouthDiv's BRAC Program. Bob explained that the BRAC Environmental Coordinator (BEC) was to be the central point of contract for all environmental efforts at BRAC bases. There will only be one Contract Task Order (CTO) per activity or installation and it will be modified as required to include additional scope. Harry provided some insight in to what funding is available. Essentially, there is \$33M for NTC, Orlando (\$5M/12M/12M/4M for 1994/95/96/97 respectfully). Subsequent to that, the CLEAN III contractor will pick up the follow-on work.

Bob Harvey also gave a short briefing on Bechtel, the new response action contractor (RAC) that had just been put under contract through SouthDiv. Bechtel will work closely with SouthDiv, the base, and ABB-ES to ensure that the most cost-effective and efficient tank program is conducted. Generally speaking, Bechtel will remove tanks once the Tank Management Plan has been developed and approved. ABB-ES will then conduct closure assessments and, if no contamination is found, the site will be declared safe for transfer. If contamination is found, Bechtel may perform an interim removal action (IRA). A formal contamination assessment and report will be generated by ABB-ES and Bechtel will then initiate remediation (of any remaining soil if an IRA has been conducted). The following figure represents the relationship of the various team members in managing the UST/AST actions.



Jim Reed provided background on the BRAC Clean-up Plan (BCP) and how it was initially developed. Jim noted that the EIC/RPMs for the various program elements (i.e. IR, RCRA, UST, etc.) are ultimately responsible for what is in the BCP. These same managers will also be responsible in the event that there are some portions that appear to be missing, or some sections that need to be strengthened or added to. ABB-ES will attend to the administrative tasks of physically updating the Plan.

Philip Georgariou briefly addressed the idea of developing a Tank Management Plan (TMP) that would show listings/maps of the tanks, priorities and plans for removals, and some philosophy regarding how the remaining areas are to be investigated and remediated (as necessary). The TMP will serve, functionally, as the Work Plan for the closure assessment of the UST/ASTs aboard the base. Jim Reed then asked if there was concurrence with the idea of removing all of the tanks, except for the facilities wherein the tank is an integral part of the facility's operation (service station, hospital, etc.). There was general agreement that this was an appropriate plan of action.

Dan Roberts noted that though all tanks on the base are registered, only 22 (10 vehicular fuel and 12 transportation-related) are regulated. The state (David Clowes) indicated that they do not require a formal closure assessment of non-regulated tanks, but one will be required for regulated tanks. Generally, a closure assessment is comprised of several sampling points and a temporary well (for water levels of less than 20" bls), with a subsequent report. (If EPA Method 602/610 protocols can be observed, an on-site GC analysis can be utilized in lieu of a formal laboratory analysis.)

Because the sites with un-regulated tanks are also going to be transferred, the State still requires that the spirit of a closure assessment be complied with for these sites. The report review process will be a lot less formal, however. It will not require a review by the city/county etc.; only the State. For the un-regulated tanks sites, it was suggested that after all of them had been removed and assessed, one master report be generated to outline the results with a closure assessment form for each tank. Those tanks that are found to be "leakers" will be transferred into the formal CAR process. This guidance applies to both above-ground and underground tanks. David Clowes passed out a new (February 1994) FDEP document that describes the State's closure assessment requirements.

Schedules for the tank investigations were discussed. Generally speaking, areas of the base will be investigated based upon when they are to be closed, and what the prioritization is for transfer of the property. The original schedule in the TMP will be best-guess for closure assessments, based upon closure/transfer priorities. As the assessments take place, the TMP will be updated, along with the BCP, to reflect any new requirements, or any reprioritization of previous schedules.

A discussion of funding for the tank work was held. Jim Reed noted that the usual separation for this type of work is that the Base takes care of compliance issues while SouthDiv funds investigations/remediation efforts after contamination has been identified. The current understanding is that SouthDiv will fund, with BRAC dollars, the removal and assessment of the tanks.

Dan Roberts raised a concern about the amount of potentially hazardous waste that could be generated during all of these tank removals. The base does not want to move out of its small-quantity generator status, which could possibly happen if there were a lot of tanks with sludge that is determined to be hazardous. Several people mentioned that it should not be a problem, but if it becomes one, perhaps a waiver could be granted. The regulations concerning small- or large-quantity generators were not conceived with BRAC and mass tank removals in mind. David Clowes also passed out an FDEP document for that describes the State's requirement for the *Removal and Disposal of Used Underground Petroleum Storage Tanks*.

A question was raised as to the appropriateness of removing tanks that serve as fuel for the only heating system. There are very few buildings that only have fuel oil for heating. With the temperate climate in the Orlando area, this was felt to be not a large problem. The general agreement was that these sites should be handled on a case-by-case basis.

A tour of representative tank sites was conducted by Steve Smith.

IR Program (non-UST/AST) Meetings (March 16th/17th)

The remaining portions of the IR program (non-UST/AST) were handled through a series of meetings and tours of environmental points of interest (POIs).

Captain Harry Smith, the Installation's Transition Coordinator, gave a briefing on his position and current plans for the closure and transfer of Installation property. He represents the Installation at the various city committee meetings that are held to facilitate the Base's transition. He also participates in the Restoration Advisory Board (RAB) that brings together participants from various interest groups to review and offer

advice on environmental issues.

The following dates, initially published in a press release several months ago, were provided as to when the different areas of the Installation would be available for transfer:

Herndon Annex	March, 1995 ¹
Recruit Training Command (RTC)	Summer, 1995 ²
Service Schools Command	October, 1996 ³
Navy Hospital	July, 1995
Area "C" Supply Area	July, 1998
Nuclear Power Schools	October, 1998
North McCoy Annex ⁴	October, 1995
South McCoy Annex	October, 1998
Main Base Golf Course	October, 1998

¹The Navy's training group is currently scheduled to vacate in October, 1994, though they may request a year's extension on this date.

²The last graduation is scheduled for December 7, 1994.

³The last graduation is scheduled for February, 1995.

⁴McCoy is split by a figurative east-west line that crosses the property along 8th street, between the 668-unit Capehart housing and the newer, townhouse-style housing at the southern end of the facility.

The main base will be closed, generally speaking, from north to south. The RTC has been programmed for a phased operational closing with the initial phase already implemented. The Navy Hospital is currently being recommended for transfer to the Veteran's Administration. Area "C" will be retained as long as possible to provide storage capacity while the base downsizes. The initial priorities, from an environmental assessment standpoint, is the Hospital, the RTC, North McCoy Annex, and the Service Schools Command.

A tour of various POIs was then held for the group that will be writing the Site Screening Work Plans. POIs at all four geographic areas of the base were reviewed over the course of the two days. The purpose was to allow the technical writing staff to review the POIs and obtain information relating to adjacent areas as well potential contaminant migration pathways and receptors.

A meeting was held with SouthDiv representatives and the ABB-ES project manager to discuss what efforts should be included in the next contractual modification to CTO-107. The following areas were identified as actions/efforts that can be undertaken immediately:

- Project Management Support
 - Day-to-day Management
 - Periodic Management Meetings
 - Community Relations Support
 - Technical/Financial Monthly Reports (TFMR)
- Development of the Tank Management Plan (TMP)
- Update of the BRAC Clean-up Plan (BCP)
- Update of the BRAC Environmental Status Database
- Development of Site Screening Work Plan for Remaining Gray Areas
- Development of RI/FS Work Plans for North Grinder and McCoy Annex Landfills
- Background Sampling
 - Develop Background Sampling Plan
 - Conduct Sampling
 - Write Technical Memorandum
- Implement Site Screening on Initial 10 Sites
- Conduct UXO Investigation at McCoy Annex

Develop Asbestos Management Plan and Provide Support for Its Implementation
Develop Lead Paint Management Plan and Provide Support for Its Implementation

Additional efforts that could be implemented within 4-5 months include:

Implement Site Screening On Remaining Gray Areas
Implement RI/FS On Two Landfills
Update EBS's For Transferring Properties

A meeting was held between ABB-ES and SouthDiv to decide upon the first 10 study areas to be investigated. This determination is necessary in order to finish the Site Screening Work Plan that is currently on contract. Attendees from SouthDiv included David Criswell, Jim Reed, Barbara Robinson, Billy Drawdy, and Robert Rivers. Attendees from ABB-ES included Philip Georgariou, Tracy Stenner, Joe Daniel, John Blieler, Mark Joop, and Mark Salvetti. While the EBS provided individual points of interest (POIs) to be investigated, it was determined that many of them could be grouped into study areas based upon geographical proximity, similarity of media, and/or similarity of investigative techniques. The first ten study areas that were agreed to are:

Rusk Chapel (RTC area, PCB contamination)
Indoor Rifle Range (RTC area, fugitive air emissions)¹
Hazardous Material Storage Area (Service Schools Command area, 3 buildings, 73/2816/2817)
Fire Training Facility (RTC area, 2 buildings, 200/209)
Hospital Area Landfill (alleged)
Lake Baldwin/Susannah
Natural Areas (McCoy Annex)
Former DRMO (McCoy Annex, 4 buildings, 7178/7190/7191/7193)
Multi-Use Storage Area (McCoy Annex, 2 buildings, 7187/7195)
Former Waste Water Treatment Plant (McCoy Annex)

¹Subsequent review has shown that the rifle range has emission control systems installed and may not be a problem area.

It was recognized that there were many other POIs within the initial broad areas to be transferred, but it was felt that because their investigations would be placed on contract within the next 4-5 months, there will be no adverse impact from delaying them until that time.

A discussion was held regarding the management of investigative derived waste (IDW). In order to avoid violating RCRA storage regulations, some agreements will have to be reached with both the regulators and the waste management personnel (DRMO) aboard the Installation. A generic description of the IDW management plan will be incorporated into the Project Operation Plan.

A group (including David Criswell, Jim Reed, Barbara Robinson, Robert Rivers, and Philip Georgariou) discussed the need to rapidly provide community relations support for the restoration advisory board. Philip Georgariou noted that efforts were underway to select a local Public relations firm, but that their services could not be formally contracted for until a contract modification was received authorizing their services. Several different ideas were discussed as to how to most expeditiously retain community relations support. The current CTO-107 SOW was reviewed and it was determined that there was no tasks that included those activities. Barbara Robinson agreed to develop a new scope of work and provide it to Robert Rivers, who in turn agreed to expeditiously place it on contract.