

**MEETING MINUTES  
RCRA FACILITY INVESTIGATION  
NAVAL STATION ROOSEVELT ROADS, CEIBA, PUERTO RICO**

**MEETING LOCATION:** Environmental Protection Agency Region II  
**MEETING DATE:** January 13, 1995  
**ATTENDEES:**

<u>NAME</u>	<u>AFFILIATION</u>	<u>PHONE NUMBER</u>
Sindulfo Castillo	USNS Roosevelt Roads	(809) 865-3155
Thomas Fuller	Baker Environmental	(412) 269-2065
James Szykman	LANTDIV	(804) 322-4811
Barry Tornick	EPA	(212) 264-9601
Art Wells	LANTDIV	(804) 322-4587
Tim Gordon	EPA	(212) 264-9538
Richard Egan	TRC	(908) 563-1100
Greg Dripps	TRC	(508) 656-3586

**MINUTES:**

0930 Opening statement by Barry Tornick.

0935 Art Wells requested that EPA become involved up front prior to work and suggests that meetings be scheduled every one to two months. Barry Tornick suggests that meetings be held as needed instead of on a regular schedule and suggests using conference calls as a cost control measure. There was a consensus on this idea.

0940 SVOC Issue

Art Wells brought up the SVOC data issue and asked if the data could be used or if they would be required to resample for SVOCs.

Greg Dripps said that he would need some time to review the Baker report which discusses the SVOC issue.

Tim Gordon stated that EPA's contractor, TRC, would have to review the report before a firm decision on this issue could be made. The Navy/Baker gave a short explanation of their approach to the problem. It was agreed that TRC's review would be completed within three weeks (by Greg Dripps).

Barry Tornick suggested that TRC contact Baker directly for any questions about the SVOC report.

0950 Art Wells asked if they should submit a revised Pre-Investigation Corrective Measures Study Report (PICMSR), before proceeding with the RFI Work Plan.

Tim Gordon said that EPA will issue a letter indicating that the PICMSR, subject to EPA's comments in its December 19, 1994 letter, will satisfy Task I and II of the RFI Statement of Work pursuant to the Permit. Tim further stated that the Navy does not need to submit a revised PICMSR, but that the RFI Work Plans should reflect comments contained in EPA's December 19, 1994 letter.

0955 Tim Gordon stated that data presented in the PICMSR were often not well organized, and that the RFI work plans need to present the data more clearly.

Greg Dripps specifically noted that sample depths, locations, and QA/QC information were not supplied.

James Szykman stated that the 1986 Confirmation Study results can only be used qualitatively because the Navy does not have the QA/QC for the results. Jim also stated that the Baker data are more reliable, and that most of the weight should be put on those results.

Tim Gordon stated that in the RFI Work Plans to be submitted the maps need to be substantially upgraded to include all past sampling locations, significant regulatory exceedances, and topography including swales and ditches.

Barry Tornick added that at a minimum, a rationale for any sampling locations should be provided.

Tim Gordon stated that for the three landfills (SWMUs 1, 2 and 3), the main concern is what is not characterizing the waste material itself, but what is being released from them.

1010 SWMU 1

Tim Gordon stated that the RFI Work Plan should contain some language that would allow flexibility in sampling so that samples could be collected from leachate areas if found in the field instead of just arbitrary points on a map. Tim also stated that there needs to be some sampling of the surface soils at SWMU 3. In addition, Tim stated that Appendix IX [Analytical Parameters] should be performed on all three landfills due to the wide range of contaminants that could have been disposed of in these areas.

1030 SWMU 2

Tim Gordon stated that sediment sampling needs to be performed at SWMU 2.

Tom Fuller argued that sediment sampling was not needed due to access restrictions

imposed by the mangroves (an environmentally sensitive area) and due to the fact that it is infeasible to remediate this area.

Tim Gordon stated that the map for this SWMU should include the high and low tide lines, the edge of vegetation line, and other relevant features which could impact sediment sample collection.

In the end, it was agreed that the RFI work plan will include sediment samples, to the extent practicable, for adequate definition of any releases from this unit.

#### 1045 Land Use

Greg Dripps asked about the institutional controls at Roosevelt Roads that would prevent development on the SWMUs.

Tim Gordon stated that for risk analysis purposes, when excluding potential residential usage scenario, it is not sufficient to state that the facility is/will always be utilized as a military facility. Tim stated that for most Roosevelt Roads SWMUs, any risk analysis must either consider a residential usage scenario, or else provide institutional controls to prevent such future usage.

Sindulfo Castillo stated that the base has a Master Plan which restricts the use of land for these areas.

Tim Gordon stated that documentation of such restrictions needs to be supplied where risk analysis is predicated on a non-residential usage.

#### 1055 Groundwater Use

Greg Dripps asked if the groundwater in the area was potable, and stated that if for risk assessment it was to be treated as not potable, then some reference/documentation of its non-potability should be included with the RFI work plans.

#### 1100 Break

#### 1110 Break Over

Gregg Dripps stated that hardness and TOC content should be added to the list of parameters for surface water samples at all three landfills. This would aid in a determination of whether surface water was being impacted, and potential ecological receptor concerns (i.e. fish) could be evaluated.

Sindulfo Castillo stated that crabbing is not permitted on the base.

Tim Gordon stated that surface water samples do not necessarily need to be collected from the bay, but should be collected from any ditches/swales, or ponded water, or where there is visual evidence of leachete seeps.

1115 Tim Gordon stated that for the RFI Work Plans and all RFI results reports, all exceedances of draft Subpart S health-based action levels, and/or MCLs need to be noted and discussed in the report.

1117 Greg Dripps asked if the ground water samples that have been collected were filtered or unfiltered. Greg raised this issue because some of the particles that get filtered during the filtering process are mobile in the aquifer and as a result, filtering could cause an underestimation of possible leaching from the landfills. Greg recommended using a low flow peristaltic pump to purge the wells to keep turbidity to a minimum.

Tim Gordon stated that EPA wants unfiltered ground water analytical results; however, filtered samples may also be analyzed if the facility wishes.

1125 SWMU 11 (IR Site 16)

Tim Gordon stated that in the RFI Work Plans to be submitted by March 28, 1995, EPA would like the investigations of the large underground tanks at this site to include soil borings to the water table.

Tom Fuller of Baker stated that they do not presently know what is going to be done with the tanks, and that they are in the process of deciding on how to approach that problem. Tom stated that their approach will be affected by what they find from drawings and from their visual inspection of the tanks.

1155 SWMU 13

Richard Egan and Greg Dripps pointed out that the figures for this SWMU need to depict the former location of the building, the reported drainage ditch, topography, and any piping/leachfields that were associated with the former building. Rich and Greg also stated that the extent of the marsh area (if any) needs to be depicted in the figure.

1205 SWMUs 31 and 37

Tom Fuller stated that a soil gas survey at these two SWMUs would not be useful because the asphalt would trap the vapors and cause them to spread laterally.

Richard Egan, Greg Dripps and Tim Gordon agreed with Tom's argument. As a

result, EPA will not require a soil gas survey to be performed during the RFI for SWMUs 31 and 37.

1230 SWMU 39

Tim Gordon stated that "background" samples from this SWMU are not required, as Subpart S action levels will be taken as the standard.

Also Tim stated that the map for this SWMU (and SWMUs 41, 50, and 52) should include topography contours on the east/southeast side of this SWMU (these SWMUs).

1245 AOC C

The samples that were incorrectly located on the map for AOC C will be moved accordingly to surround the three pads that comprise AOC C. The Timber Storage area denoted on this map is not really there according to the Navy representatives, who stated the error was the result of a graphic artist's mistake.

1300 Meeting adjourned.