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July 7, 1998

Project Number 5278

Mr. James X. Shafer
Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order 218

Subject: RAB Meeting Minutes

Dear Mr. Shafer:

Enclosed are the minutes from the June 17, 1998 RAB meeting. If you have any questions about this matter, please contact me at 978-658-7899.

Very truly yours,

A handwritten signature in cursive script that reads "Betsy Horne".

Betsy Horne
Community Relations Specialist

BH:b

Enclosures

c: Dr. D. K. Abbass (w/enc.)
Mr. Alfred Arruda, Jr. (w/enc.)
Ms. Barbara Barrow (w/enc.)
Ms. Anne Berman (w/enc.)
Ms. Mary A. Blake (w/enc.)
Dr. David W. Brown (w/enc.)
Mr. Richard D. Coogan (w/enc.) Mr. Paul M. Cormier (w/enc.)
Mr. Anthony D'Agnew (w/enc.)
Ms. Beth Everett (w/enc.)

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Mr. James X. Shafer

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c: Mr. Mike Foley (w/enc.)
Mr. Byron J. Hall (w/enc.)
Ms. Elizabeth Mathinos (w/enc.)
Mr. Thomas McGrath (w/enc.)
Mr. John Palmieri (w/enc.)
Mr. Howard L. Porter (w/enc.)
Mr. Paul D. Russell (w/enc.)
Mr. Charles Salmond (w/enc.)
Mr. John Torgan (w/enc.)
Ms. Claudette Weissinger (w/enc.)
Ms. Mary Philcox (w/enc.)
Mr. David Egan (w/enc.)
Mr. Tom Nicholson (w/enc.)
Mr. Paul Kulpa, DEM (w/enc.)
Ms. Kymberlee Keckler, EPA (w/enc.)
Capt. Jon Wyman, NETC (w/enc.)
Mr. David Sanders, NETC (w/enc.)
Mr. David Dorocz, NETC (w/enc.)
Ms. Melissa Griffin, NETC (w/enc.)
Mr. Woody Monaco, NETC (w/enc.)
Ms. Sarah White, EPA (w/enc.)
Ms. Jennifer Hayes, Gannett Fleming (w/enc.)
Mr. Tim Prior, USF&WS (w/enc.)
Mr. Ken Finkelstein, NOAA (w/enc.)
Capt. Bogle, NETC (w/enc.)
Mr. James Barden (w/enc.)
Hon. Paul W. Crowley (w/enc.)
Hon. June Gibbs (w/enc.)
Mr. Joseph F. McEnness (w/enc.)
Councilman Dennis McCoy (w/enc.)
Mr. Vincent Arnold (w/enc.)
Dr. David Kim (w/enc.)
Mr. Brian Bishop (w/enc.)
Sister Annie Marie Walsh (w/enc.)
Brother Joseph (w/enc.)
Newport Public Library (w/enc.)
Ms. Joanne Gorman, Middletown Free Library (w/enc.)
Portsmouth Free Public Library (w/enc.)
Mr. Bob Jones, Groton (w/enc.)
Mr. R. Boucher, NORTHDIV (w/o enc.)
Ms. Diane McKenna, B&RE, Wilmington (w/enc.)
Mr. Garth Glenn, B&RE, Philadelphia (w/enc.)
Ms. Meg Price, B&RE, Philadelphia (w/o enc.)
File 5278-3.2 w/o enc./9.4 w/enc.

NAVAL EDUCATION AND TRAINING CENTER
RESTORATION ADVISORY BOARD MEETING
JUNE 17, 1998

MINUTES

On Wednesday, June 17, 1998, the NETC Newport Installation Restoration Program Restoration Advisory Board (RAB) gathered at the NETC Officers' Club for its monthly meeting. The meeting began at 7:00 pm and ended at 9:11 pm.

Eleven of the 20 RAB community members attended: Kathy Abbass, Barbara Barrow, Mary Blake, David Brown, Dick Coogan, Beth Everett, Byron Hall, Tom McGrath, John Palmieri, Howard Porter, and Paul Russell. Other RAB members attending were: Paul Kulpa, the RIDEM Remedial Project Manager; Kymberlee Keckler, EPA Remedial Project Manager; Jim Shafer, NORTHDIV's Remedial Project Manager; and Captain Jon Wyman, Navy Co-chair. Dave Dorocz, Melissa Griffin, and Kevin Coyle were present from the NETC Environmental Division; Pete DuBois represented the Public Affairs Office. Sarah White, EPA's Community Involvement Coordinator, also attended. Anne Berman, Tony D'Agnew, Liz Mathinos, and Claudette Weissinger provided notice of their absence. Al Arruda, Paul Cormier, Mike Foley, Chuck Salmond, and John Torgan were not present.

Agenda items are denoted in the minutes by the underscored headings.

CALL TO ORDER

Tom McGrath, the Community Co-chair welcomed the RAB.

OLD BUSINESS

Tom inquired whether anyone had changes to the May 20, 1998 meeting minutes. They were adopted without change.

Tom mentioned that a request had been made at the last meeting for someone from NORTHDIV to make a presentation on IR sites cleanup funding. Jim Shafer indicated he has a promise from Paul Yaroschak, Director, Environmental Compliance and Restoration Policy, Office of the Assistant Secretary of the Navy, to provide that briefing sometime this summer.

Jim also mentioned an issue that came up in the pre-meeting briefing Kymberlee Keckler gave on the Superfund process. Each "deliverable" or report created to support a site cleanup, from work plan to feasibility study, has three versions: a draft, a draft final, and a final. EPA, RIDEM, and the RAB are copied on the draft and draft final versions to review and provide comment.

COMMITTEE REPORTS

Jim expanded his site status briefing and a review of the RAB Review Dates Calendar at the request of Tom McGrath.

Derecktor Shipyard - A lot of activity has occurred at the site in the last year and one-half.

- Work in the stillwater basin continues. The media disks suspended to determine stress on the local biological community will be removed in July.
- The draft final human health risk assessment will be issued on June 19.
- The draft off-shore feasibility study is underway. Preliminary remediation goals are being developed and the Navy is preparing responses to comments on them.
- The hot spot removals are underway for the two areas of concern identified in the draft SASE report, that is the Building 42 sump pit and TP-14 PCB areas.
- The south shore cove beach area removal is complete.
- A removal action completion report will be issued when all removal activities have been completed.

Old Fire Fighter Training Area

- The off-shore ecological risk assessment is about 40 percent complete. SAIC and URI have been collecting lobsters, fish, and shellfish. The draft should be issued in February 1999; it will be incorporated into the remedial investigation, also due in fiscal year 1999.

Comment: Will the ERA be able to make a distinction between contamination from OFFTA and the Newport sewage treatment plant that may be effecting the bay animals?

Response: They are measuring for a sewage tracer.

Gould Island

- There is no funding this fiscal year to implement the work plan; hopefully, money will be available next year. The Army Corps of Engineers, which owns several sites on Gould Island that need remediation, will also not be able to begin their work this year. As a cost-saving step, we still hope to reimburse them to conduct the work on our IR site.

NUWC

- No funding is available this year. We hope to be able to issue the \$414,000 contract for the SI field work and report sometime next year.

Comment: Is it possible that end-of-year funds might pop up that would allow you to start the NUWC work?

Response: No. NORTHDIV received a letter last week cutting this year's funding by 10 percent (or \$3 million). Apparently the Navy needs to increase its funding to states for support on DOD cleanups and had to use existing funding sources to meet that commitment.

McAllister Point Landfill

- The fourth quarterly post cap construction groundwater sampling round has been completed.
- Landfill gas sampling is scheduled for July.

Background Work Plan

- Comments were received from EPA, RIDEM, and David Brown. The most significant was the fact that the state requires a minimum of 20 samples per site. It is not clear whether that number applies to each site for soil generally, or whether 20 surface and another 20 subsurface samples are required. This project started out as a simple, expediting effort, which is now growing into a project that is larger in scope and currently unaffordable. We may have to change strategy and resort to establishing a background level for each IR site.
- Dave Brown put the Navy in touch with a contact at the USDA Natural Resources Conservation Service. Consequently, the Navy, RIDEM, and Everett Stewart (USDA) conducted a field trip to select appropriate sample locations for the Melville North Landfill.

Melville North Landfill - This is not an IR site; state site remediation guidelines are being followed.

- We are preparing site-specific background values for the site. A remedial action work plan is being prepared that will be submitted to the state for review this summer; a cleanup is scheduled for fiscal year 1999. The site is owned by Melville Marine Industries.

Comment: Will the large amount of money you will be spending at the site mean that other NETC sites will not be funded?

Response: Not necessarily. We prepare our budget requests 2 years in advance; a big project may end up providing NETC with more money. In addition, we could decide to do just a portion of the Melville cleanup in FY 1999, spacing the entire job over more than one fiscal year to ensure other sites can also be addressed. On the whole, however, it is becoming harder and harder to obtain sufficient funding for these projects, because more sites are entering the remediation phase.

Comment: Was the recent correspondence by the site owner's attorney the reason you are moving forward on Melville now?

Response: The site was scheduled for remediation even before we received their letter.

Comment: You indicate you are following state, not CERCLA cleanup guidance for this site. How similar are the programs? What would you do if EPA listed the site on the National Priorities List?

Response: The state process is much quicker. There would be no advantage in reverting to the CERCLA requirements. Additionally, we are required to satisfy RIDEM's site remediation regulations.

Comment: Shouldn't the RAB be involved in the Melville site? It is a problem for all of Aquidneck Island.

Response: It is not an IR site but that decision is up to NETC. Captain Wyman indicated he would include Melville in future IR briefings and presentations.

Tank Farm Four

- Implosion work is finished.
- Additional Site Investigation field work requested by RIDEM cannot begin until funding becomes available. The issue involves whether sludge placed on the ground has impacted the site. Once that work is completed and the issue resolved, we expect that IR work there will be finished.

Tank Farm Five

- We hope to have implosion work conducted before the end of the fiscal year.
- The Navy believes that a No Further Action decision is warranted regarding IR issues. EPA concurred with that position in a May 15 letter. RIDEM has not responded.

Comment: Are the insurance certificates issued to homeowners that could be impacted by the Tank Farm Five implosions still in effect?

Response: Art Holcomb from Foster Wheeler stated he would check on their status.

COMMITTEE REPORTS

Public Information Committee - Claudette Weissinger was not able to attend tonight's meeting but indicated she was satisfied with the quarterly newsletter, which was mailed out today. NETC also promised to add Tom McGrath's name to the public notice published each month announcing the RAB meetings.

Project Committee - Kathy Abbass mentioned that she was attempting to make an appointment with Captain Wyman to discuss obtaining TAPP funding.

Membership Committee - Paul Russell reminded the RAB that charter members were sent a form to fill out indicating whether they wished to sign on for another 2-year membership. Nothing has been heard from 5 of the 11 charter members. The 5 of the 6 who did respond will continue as members; Paul is resigning but will do so with a transition period. He is passing his committee chairmanship to Howard Porter. Barbara Barrow has agreed to become a Membership Committee member.

Comment: Has there been any further thought to adding a representative from Jamestown (which owns Gould Island) to the RAB?

Response: That would be all right with the Navy.

Planning Committee - Dave Brown mentioned that John Palmieri and Dick Coogan have joined the Planning Committee and have read the draft final McAllister FS. After the evening's presentation, they would like to discuss the best way for community members to transmit their comments on documents to the Navy. Dave also mentioned that they had been discussing the possibility of requesting that EPA and RIDEM participate in the site status updates more actively so the RAB can get a better idea of where their perspectives differ from the Navy's positions.

PRESENTATION ON THE DRAFT FINAL MCALLISTER POINT LANDFILL FS

Diane McKenna from Tetra Tech updated the presentation she made a few months ago on the draft McAllister Point Landfill feasibility study that evaluates technologies to address contaminated marine sediments. The accompanying fact sheet describes the site history and the options considered. Changes adopted into the draft final version were a result of comments from EPA, RIDEM, and the RAB. The presentation focuses on changes from the draft and includes a summary of highlights of the alternatives evaluations.

The near shore area is defined as locations that are up to 3 feet deep or contain landfill materials. The elevated risk offshore area (zone 3A) is considered with the near shore locations because the areas have similar risks and would be addressed in the same manner. For near shore and elevated risk off shore areas, the alternatives evaluated included:

- **NS-1, No Action.** Required to provide a baseline against which other alternatives are compared; 5-year reviews.

- NS-2, Limited Action. Construct shoreline fencing, signs, and a buoy system; implement long-term monitoring and 5-year reviews.
- NS-3, Capping. This alternative would bury the contaminated sediments so people and animals would not be exposed to them. Remove debris from subgrade; install a multi-media cap (with concrete armament and geotextile, topped with 2 feet of course materials (sand, gravel, cobble, and large, wave-breaking boulders) in high energy areas and a sand-stone-gravel cap in low energy areas; implement long-term O&M and monitoring, and 5-year reviews. The cap design has changed from the draft FS because of regulator comments and recommendations from the Army Corps of Engineers.

Comment: Would you have to dam the area before installing the cap?

Response: Temporary coffer dams would be installed only in the southern area; the rest of the work would be done from a barge.

- NS-4, Capping with Dredging to Match Existing Grade. This is a new alternative included in the draft final FS. It is similar to Alternative 3, except that before capping, 2 to 3 feet would be dredged so the cap would match the present grade. Areas with contaminated sediments remaining would be capped as described for Alternative 3. Locations where all contaminated sediments are removed would be backfilled with natural fill. Dispose of the sediments under the existing landfill cap, peaking the mound and making it approximately 25 feet higher than its present elevation; implement long-term O&M and monitoring, and 5-year reviews.
- NS-5, Dredge and Dispose. Excavate contaminated sediment, dewater it, and dispose of the sediments under the existing landfill cap and/or in an approved off-site facility (approximately 10 percent of the sediment is estimated to be hazardous and therefore would have to be treated before disposal and/or disposed at an (expensive) hazardous waste facility). Cover the dredged area with clean fill.

Comment: Why didn't you include the same kind of hazardous waste treatment option in Alternative 4 that you did in Alternative 5?

Response: The rules differ in the case where you are only transferring materials from one location at a site to another on-site location. We would be required to follow RCRA rules for any materials disposed off site. The same rules would not apply to on-site disposal under the landfill cap (where all material would be disposed under Alternative 4 and some under Alternative 5) In the case of Alternative 4, if the costs showed that disposing the sediments under the existing cap and off-site disposal were similar, then off-site disposal might become more attractive than reopening the cap. In that case, the same treatment options would apply to Alternative 4.

Diane displayed and discussed a view graph table to show how the near shore and elevated risk offshore area alternatives compare, using several important criteria. She stressed that the evaluation terms used on the table are relative terms used to differentiate

the alternatives from on another. The evaluation criteria displayed wer selected to highlight the significant differences; they are not the exact criteria used in FS evaluations.

**EVALUATION HIGHLIGHTS
NEAR SHORE and ELEVATED RISK OFFSHORE ALTERNATIVES**

ALTERNATIVE	PROTECTION		SHORT/LONG-TERM IMPACTS		IMPLEMENTABILITY	C ST
	Humans	Environment	Environment	Community		
NS/ER-1 - NO ACTION	None	None	None	None	Easy	\$46,000
NS/ER-2 - LIMITED ACTION	Limited	None	Minor (S)	None	Easy	\$656,000
NS/ER-3 - CAPPING	Effective	Effective	Significant (S,L)	Moderate (S)	Difficult	\$13,000,000
NS/ER-4 - CAPPING W/ LTD DREDGING	More Effective	More Effective	Significant (S)	Significant (S,L)	More Difficult	\$18,000,000
NS/ER 5 - DREDGING	Most Effective	Most Effective	Significant (S)	Significant (S,L)	Most Difficult	\$24,000,000

Alternatives 3, 4, and 5 would need to comply with coastal zone requirements to protect spawning fish; it would restrict work in these areas to 2 to 2.5 months a year. For alternative 3, that would translate into work over a 3 to 4 year period; for alternative 4, a 5 to 6 year period; and for alternative 5, a 3 to 4 year period.

Comment: Do the costs on your table assume receipt of a waiver?
Response: Yes.

Comment: Is there precedent for obtaining a waiver? Was one granted at Davisville?
Response: Waivers are sometimes available but Davisville did not obtain one. The scope of the work they were pursuing may have been smaller than this project.

Comment: Do your costs take into account the labor rates that may be in effect years from now if we cannot obtain a waiver?
Response: The costs include a 7 percent discount rate.

Comment: How can the no action alternative cost \$46,000?
Response: Its sole feature is 5-year reviews, which are conducted over 30 years. The reviews include literature searches and regulation review.

Comment: Would placing a cap over the area help stop erosion?
Response: It would be designed to stop erosion. We certainly hope it would.

For the offshore areas, the alternatives evaluated included:

- OS-1, No Action. Required to provide a baseline against which other alternatives are compared; 5-year reviews.
- OS-2, Limited Action. Long-term monitoring and 5-year reviews.

OS-3, Capping. Install a natural cap; implement long-term O&M and monitoring, and 5-year reviews.

- OS-4, Dredging and Disposal. Dredge contaminated sediment, dewater it, and dispose of the sediments under the existing landfill cap or in an approved off-site facility.

Diane displayed a view graph table to show how the risk offshore area alternatives compare, using the same criteria. She stressed that the evaluation terms used on the table are relative terms used to differentiate the alternatives from one another. The evaluation criteria displayed were selected to highlight the significant differences; they are not the exact criteria used in FS evaluations.

EVALUATION HIGHLIGHTS OFF SHORE ALTERNATIVES

ALTERNATIVE	PROTECTIVENESS		SHORT/LONG-TERM IMPACTS		IMPLEMENTABILITY	COST
	Humans	Environment	Environment	Community		
OS-1 - NO ACTION	NA	None	None	None	Easy	\$46,000
OS-2 - LIMITED ACTION	NA	None	None	None	Easy	\$657,000
OS-3 - CAPPING	NA	Effective	Significant (S)	Significant (S)	Difficult	\$21,000,000
OS-4 - DREDGING	NA	More Effective	Significant (S)	Significant (S)	More Difficult	\$44,000,000

Alternatives 3 and 4 would need to comply with the same coastal zone requirements mentioned earlier.

Comment: How much dirtier is this area compared to the rest of the bay?

Response: It is a little dirtier than the background location selected but human health and ecological risks are a good deal higher in the near shore areas. We use a hazard quotient of 1 to indicate no impact. The offshore areas are all less than 3. Near shore areas range from 3 to 10, with a couple spots with a hazard quotient of up to 16.

After the final FS is issued, the Navy will draft the proposed plan, which contains the Navy's preferred alternative. Jim Shafer asked the RAB members how they feel about these alternatives. Dave Brown was given two copies of the draft final version; Kathy Abbass and Tom McGrath have the two others provided to the community members. Dave's copies have been circulated to Dick Coogan, John Palmieri, and Barbara Barrow. Dave asked how the community member comments on the report should be conveyed to the Navy. It was agreed that comments should be forwarded to the respective committee chairs, who will forward them to Melissa. If the community members need more copies, the Navy can provide them; copies are also available in the information repositories at the three public libraries.

A lengthy discussion ensued concerning what would have to happen to complete all work at the McAllister Point Landfill site. Paul Kulpa stated that in the early 1990s, the Navy and the regulators wrestled with whether to deal with a host of issues and then construct the cap, or build the cap and then deal with the remaining problems. It was decided that building the cap would provide a relatively rapid and higher level of protection than waiting. As a result, the 1993 ROD, which required construction of the existing cap, stipulated that additional studies needed to be completed on landfill gas, leachate, groundwater contamination, and contaminated sediments. Paul mentioned that a reactive wall might be needed to treat groundwater sometime in the future. As a result, until these studies are complete, RIDEM will not agree that everything necessary to be done to the site has been completed.

Jim Shafer pressed Paul about what amount of data on each problem would be sufficient to obtain RIDEM's concurrence. He expressed concern that the Navy could spend a large amount of money attempting to address these areas, only to find later that the measures will not satisfy RIDEM. The Navy needs to make decisions on how to deal with landfill gas and whether to monitor or model groundwater issues.

Kymerlee expressed disagreement with some of the criteria presented in Diane's comparative tables. She also disagrees with some of the evaluations presented in the FS. For example, Alternative NS-3 may not meet all environmental regulations (RCRA washout standard and some provisions of the Clean Water Act). She thought Alternatives NS-4 and NS-5 may be acceptable.

Comment: How many quarters of post capping groundwater data have been collected and analyzed?

Response: Four rounds have occurred. The results are summarized in the FS and the full data set is included as an appendix. Paul indicated that although the results look positive, it is unclear that this information reflects the success of the cap in stopping infiltration. There is no assurance that this pattern will hold long term.

Comment: Shouldn't this be enough data to make a solid technical judgment?

Response: Paul stated there is no need to make that decision right now. The Navy needs to come to the regulators and say it feels leachate is not a problem.

Comment: What will it take for RIDEM to agree that the Navy has enough information to come to closure?

Response: They need to model or monitor. More than likely there will be no problem.

Comment: Was any research done on treating the sediments in place?

Response: We ruled out evaluating that alternative based on technical difficulties. Most of the sediments are comprised of fine particles.

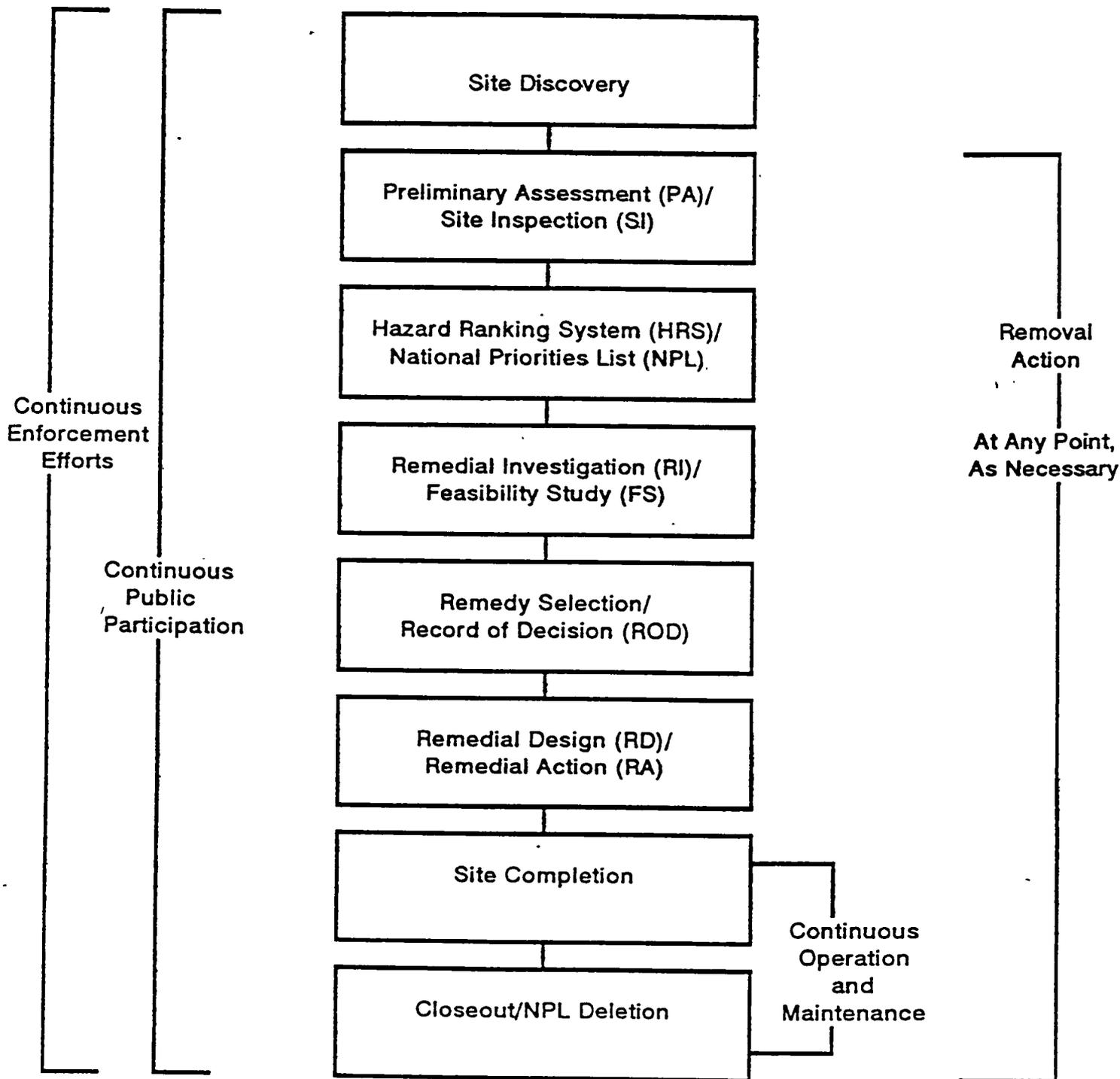
NEXT RAB MEETING

The July 15 RAB meeting will be a site tour. Please contact Melissa Griffin at 841-6375 by close of business July 6 if you wish to reserve space on the bus. Dave Brown suggested that "you are there" story be written about the site tour for inclusion in the next quarterly newsletter.

Handouts: RAB Review Dates Calendar
McAllister Point Landfill FS fact sheet
NETC RAB meeting comment sheet

Enclosures: Re-amended page from the April minutes
Kymberlee's diagram of the Superfund process
Revised NETC RAB Community Member list (w/ draft version)
Revised NETC RAB Member Roster (w/ draft version)

The Superfund Process



Response: The draft work plan was sent to the regulators last week and we anticipate a period for comments. After agreement, the actual sampling could be completed in 2 to 3 weeks. We could have the report a month and a half later.

Comment: Have you talked with entities such as the USDA Natural Resources Conservation Service about soil types that may be present?

Response: Yes. We have lots of data on metals concentrations in soil. In addition, the state has released a list of background concentrations they established based on samples collected in the Providence area. The regulations allow us to establish more precise background levels for areas with different characteristics.

Comment: This is more than an engineering exercise. Soil types can effect drainage, and whether and how contaminant migration may occur. Aquidneck Island has clayey soils. In addition, contaminants can release metals formerly bound to native soil.

Comment: Why are you looking for naturally occurring concentrations of man-made contaminants?

Response: We need to establish the "upgradient" condition to IR sites to quantify how much contamination exists in the absence of any Navy IR site-specific influence.

Comment: How far are the sampling points from the shoreline? Are some on private property?

Response: They are approximately a quarter mile from the shore. Most are on Navy property.

Comment: Where is the sampling location at the Melville site?

Response: In the area of the ponds near the waterfall.

Comment: Are you taking any samples near the beach at Melville?

Response: No. We want to stay away from known contaminated areas.

Comment: Why aren't you doing a background study for each IR site?

Response: RIDEM's site remediation regulations allow studies to be conducted to better identify local background levels. We plan to use the proposed background analysis for upcoming work at Melville North Landfill. The state's arsenic background number (1.7 ppm) is very conservative, so it is important that we establish local background ranges when conditions here are different from the locations on which the state based its results.

Jim Shafer requested that Paul Kulpa send him a pamphlet the state prepared discussing how the RIDEM background numbers were derived.

Comment: Will you normalize your data to aluminum and iron and/or TOC (interpolate to assess whether contaminants that bind to soils make them less toxic)?