MEETING MINUTES

Subject: USEPA Comments - Building LP-20 Site
Draft Final Remedial Investigation/Feasibility Study (RI/FS) Reports
Date: August 12, 1996

Participants:

Baker Environmental, Inc.: David Mamrose and Thomas Biksey
LANTDIV: James Harris
Naval Base: Dianne Bailey
USEPA: Harry Harbolt

Summary:

A teleconference meeting was held on August 12, 1996 to discuss the USEPA's comments on the Building LP-20 Draft Final RI/FS Reports. Mr. Harbolt did not have an opportunity to review the comments/responses which Mr. Harris had faxed to the previous USEPA site manager (Robert Thompson). Therefore, a thorough discussion of the comments and responses was not possible. Instead, the four parties discussed several of the key issues concerning the site and the primary questions presented by the USEPA.

Overall, the USEPA agreed to have the LP-20 site move toward completion by not requiring that a ecological study of Bousch Creek be included with the RI/FS. This information can be completed at another time with further discussions with the USEPA anticipated. The USEPA also accepted the recommendation that air sparging/soil vapor extraction be the first alternative for remediation of the site.

Direct questions asked by the USEPA and their associated responses are provided below:

Issue: The USEPA requests that a base-wide watershed ecological assessment (EA) be performed for the Norfolk Naval Base.

Response: A base-wide EA may have benefits at the Naval Base. However, the implementation of such an extensive assessment at this time is not necessary. CH2M Hill (Hill) is currently performing an EA at the Camp Allen area. This EA includes a sampling point where Bousch Creek discharges into Willoughby Bay. Once the results of this study are known, a better understanding of what may be required for the LP-20 area would be determined.

All parties agreed that the EA would be addressed under a separate document. This would allow the completion of the LP-20 RI/FS. The USEPA stated that this issue will be discussed in greater detail in the future. Once, the base goes NPL, the USEPA will have a greater influence on requesting such a study be performed. The USEPA could insist that such a study be completed before signing a Record of Decision (ROD).

Issue: How will the free product be remediated? This contamination is in the vicinity of the Building LP-20 site but does not appear to be part of the direct remediation approach.

Response: Baker explained the actions currently performed to date by the LANTDIV UST Program. The UST Program has installed a series of monitoring wells and will use product skimming systems to remove the free product associated with the JP-5 pipeline release. The LANTDIV IR Program will construct an air sparging/soil vapor extraction (SVE) system to address the solvent contamination associated with the Building LP-20 site.

Issue: What is the reason for selecting air sparging/SVE as the preferred remediation alternative?

Response: Several key reasons were provided for the justification of selecting air sparging/SVE over the pump and treat alternative.

- Pump and treat will require a longer period of time to reach the remediation goals. This will increase the overall project costs.
- The pumping of fluids at the estimated rates (45 gpm) may cause the free product plume to be drawn to other areas of the site.
- The combination of air sparging and SVE would take care of the solvent plume in the deep aquifer and the hydrocarbon contamination in the shallow aquifer and soils.
- Where the air sparging/SVE wells would be located would effectively remediate petroleum contaminants not captured by the UST Program system.
- Hill currently performing pilot study. Once the results are known, a better understanding of the effectiveness of an air sparging/SVE system can be determined.

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Issue: How would the effectiveness of the remediation system be determined and how long would the system be in operation? What happens if levels increase after the system is shut down?

Response: Each remediation alternative in the FS specified that long-term groundwater monitoring would be performed. This monitoring would be used to evaluate the effectiveness of the system and when or if the remediation endpoints are met. Once the system is shut off, monitoring would continue for a specified period of time. If contaminant levels are observed to increase above the remediation goals, the system would be reactivated.

Issue: Why not remediate the deep (Yorktown) aquifer? This differs from the Camp Allen Landfill remediation effort.

Response: Several key reasons were provided for the justification of not actively remediating the deep aquifer.

- The levels of contaminants in the deep aquifer are significantly lower than those in the shallow aquifer.
- By remediating the shallow aquifer (the source of the deep aquifer contamination), the contaminant levels of the deep will naturally degrade over time.

➢ The risk assessment shows that the potential receptors are not at risk. With ordinances in place for the deep aquifer not to be used in this area, the poor water quality of the aquifer, and the realistic approach that this area will not be used for anything bu military purposes (no residential housing), exposure to potential receptors is unlikely.

➢ The direction of the groundwater flow is toward the bay, not inland. Therefore, the Navy has control over who can access the deep aquifer. This condition is not true at Camp Allen where residents were known to have shallow wells to water lawns and gardens.

➢ Deep aquifer will also be monitored to evaluate the effectiveness of the remediation system.

Issue: What is the schedule for the remediation of this site?

Response: LANTDIV anticipates that Hill will have the design phase of the project ready for USEPA review in October 1996. The construction activities will likely begin in late March/April 1997.

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