09.04-11/04/1993-00167

MEMORANDUM

CH2M HILL

TO: Jim Harris/LANTDIV

COPIES: Nina Johnson/LANTDIV
Bob Stroud/EPA Region III
Erica Dameron/Virginia Department of Environmental Quality
Will Bullard/NAS Oceana
Doug Dronfield/CH2M HILL

FROM: Steve Brown/CH2M HILL

DATE: November 4, 1993

SUBJECT: Minutes for the Technical Review Committee meeting to discuss the Oceana RFI and RCRA process, October 21, 1993

PROJECT: HRO20368.K0.09

The TRC meeting to discuss the Oceana RFI report and future activities at each RCRA site was held at NAS Oceana on October 21, 1993. The meeting was attended by representatives of EPA Region III, the state DEQ headquarters and regional offices, NAS Oceana, LANTDIV, and CH2M HILL. An attendance list is enclosed. The meeting format consisted of introductions followed by a presentation of the RFI results and proposed activities.

Captain Crane, the commanding officer of Oceana, opened the meeting by thanking the participants and expressing the Navy's interest in moving as quickly as possible in doing the right thing to address contamination problems at Oceana. All participants then introduced themselves and their affiliation.

Will Bullard of the Oceana Environmental Division went over the meeting agenda and goals for the meeting. He also emphasized that the contamination problems at Oceana are the result of past practices and that current programs handle hazardous constituents appropriately.

Jim Harris of LANTDIV noted that the Navy has been pursuing contamination problems at Oceana since 1984 and mentioned specific investigations in 1984, 1986, 1988 and 1990 that preceded the RFI. He expressed the joint hope that the group could move forward quickly in solving contamination problems at Oceana.

Steve Brown of CH2M HILL began the presentation of results by reviewing the history of the RCRA corrective action process at Oceana. He proposed that the discussion follow the groupings proposed in the executive summary of the RFI report, that is, (1) CMS sites 1, 2B, and 2C, (2) RFI Phase II sites 2D, 2E, 15, and 25, (3) POL sites 11, 18, 19, 20, and 24, and (4) no action sites 16, 21, 22, 23, and 26. He

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explained that proposed work would be presented immediately following results for continuity in the discussion.

CMS Sites

Site 1. Soil problem still undercharacterized. Will be the focus of the CMS investigation. Also some remaining issues related to ditch sediments. Some discussion of need for background metals, a point which applies to all sites.

Site 2B. Groundwater well characterized except for minor clarification needed near the western source area. Also some remaining issues related to ditch sediments. The need to clarify that the ditch behind the line shack is shallow, ephemeral and does not receive groundwater was pointed out.

Site 2C. Good characterization but need to find the downgradient extent of VOC contamination. Should clarify that ditches near 2C-MW3 and 2C-MW2 are very shallow. No substantial comments.

RFI Phase II Sites

Site 2D. Some discussion of a historical account that an area of soil was saturated and did not support a building adequately. CH2M HILL agreed to work with Oceana personnel to clarify these facts and, if possible, the location.

Site 2E. Explained quandary of free product fuel in well and proposed investigation to determine its source. We agreed to keep the state informed about our progress and plans.

Site 15. Good spread of characterization data from the hydraulic probe sampling program. Future plans will characterize the site extensively and leave permanent sampling points. One of the state representatives asked how much free product was present. Steve Brown said there was clear evidence of free product but we did not know how thick the layer was.

Will Bullard asked if Sites 2E and 15 needed to be handled under the state UST program. Amy Webster of the DEQ Tidewater office stated that the DEQ was satisfied if Sites 2E and 15 were covered under the RCRA program and did not see the need for this site to shift to DEQ jurisdiction. The key was to coordinate with the state and address all state requirements. They feel their concerns are being addressed currently. Erica Dameron of DEQ headquarters agreed.

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Site 25. Some remaining question about metals and pesticides in sediments. Levels are not high but are worthy of additional sampling and review. The state questioned whether the site was used for fishing. Steve Brown and Will Bullard pointed out that the access to the site was limited by a gate across the access road and posted signs. Base personnel are not allowed in the area and Will did not know if there are fish in the pond.

POL Sites

Site 11. Some discussion about the future abandonment of the two existing rings after their planned replacement with a propane-fired training ring. Will said that the soil and concrete would be disposed of properly. Bob Stroud requested a groundwater sample downgradient of the southern pit. Steve Brown and Bob Stroud agreed to finalize the location of the sample later.

Site 18. Some contamination near newer storage unit. POL investigation will address both the storage units. No substantial comments.

Site 19. Single point near Citco station had contamination by TPH. Future work will look at contamination outward from this point. CH2M HILL will review data from the investigation at the Citco station for depth to water and groundwater flow direction.

Site 20. Some TPH contamination near shed and along strip behind auto hobby shop. Investigation will probably lead to excavation and disposal using Navy RAC program.

Site 24. Bowser site with some TPH and PAH contamination that will be characterized further during the POL investigation.

No Action Sites

Site 16. Low concentrations of pesticides at both Site 16 and Site 16GC. Clarified where the edge of the concrete slab was under the covered area at Site 16GC.

Site 21. No PCBs at this site, which was the major concern. Steve Brown clarified that the detection limits for PCBs were approximately 10 to 100 ppb, so the nondetect results are meaningful.

Site 22. The state commented that they believed some of the levels in groundwater were above the MCLs. Steve Brown pointed out that the constituents they mentioned

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were actually not detected. The issue is that the detection limits were above the MCL in some cases, therefore, it is not possible to say whether the groundwater exceeded the MCLs or not. We used standard SW-846 detection limits and the presumption of a contamination problem in the face of nondetects for full Appendix IX analyses seemed inappropriate. Doug Dronfield explained that antimony and thallium have new MCLs that were not in place when the work plan was approved with the standard detection limits. Nina Johnson of LANTDIV pointed out that these detection limits are used nationwide by the environmental industry and that the Navy may want to discuss the applicability of these detection limits versus MCLs with the EPA. Both Bob Stroud and Steve Brown mentioned that Betty Ann Quinn, the EPA toxicologist involved with the Oceana RFI did not seem to have a problem with this gap between detection limits and MCLs and seemed comfortable with the no-action recommendation.

Site 23. The state raised the question about arsenic concentrations in soil being above the risk-based concentrations tabulated by EPA Region III. Steve Brown discussed the fact that Site 23 concentrations were below non-carcinogenic RBCs for commercial/industrial soil. Erica Dameron commented that the state generally looks at residential soil standards. Regarding the lower carcinogenic standards for arsenic, beryllium and others, Steve Brown cautioned that the mean soil concentrations were above these standards, so we are probably looking at a standard natural hazard rather than "contamination". Doug Dronfield pointed out that many of these issues will be addressed by the background soil samples that will be collected during the Phase II investigations. We need to wait for those results to draw final conclusions.

Site 26. Will Bullard stated that a 55-gallon drum was cut in half and buried in the ground to form the fire-fighting training ring. It was removed 10 years ago. We agreed to clarify whether the long axis of the drum was buried horizontally or vertically. Bob Stroud said that a deeper sample would need to be collected if the drum was deeper than 2.5 feet.

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