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MINUTES AND AGENDA FOR RESTORATION ADVISORY BOARD MEETING HELD 13
NOVEMBER 2008 NAS SOUTH WEYMOUTH MA
11/13/2008
NAVAL AIR STATION SOUTH WEYMOUTH



**Naval Air Station
South Weymouth, MA
Restoration Advisory Board
Summary of RAB Meeting – November 13, 2008**



1. INTRODUCTIONS/ APPROVAL OF PRIOR MEETING MINUTES

Mary Skelton Roberts opened the meeting at approximately 7:00 PM. She requested that all attendees, including RAB members, regulators, and audience members, introduce themselves. She noted that the meeting agenda, handouts, and the sign-in sheet were available on the back table. The sign-in sheet for the meeting is provided as Attachment A to this meeting summary. M. Skelton Roberts asked if everyone had time to read the minutes from the September 2008 RAB meeting and asked for comments. There were no comments on the minutes. M. Skelton Roberts asked if there were any questions on the October 2008 clean-up update. There were no questions or comments.

M. Skelton Roberts then reviewed the ground rules for the meeting and reminded the meeting attendees that the focus of the meeting is cleanup issues; redevelopment issues will be placed on the 'parking lot.' She reviewed the guidelines for the meeting and reminded the participants when asking questions to wait to speak until they are acknowledged, to state their names and affiliations, and to speak into the microphone when they have questions.

M. Skelton Roberts then reviewed the agenda for the meeting. The Agenda for the meeting and the Action Item Tracking List are provided as Attachment B to this meeting summary. In accordance with the agenda, the presentations and discussion would be followed by the Updates and Action Items portion of the meeting.

2. PRESENTATIONS

M. Skelton Roberts introduced Kristen Meyers of Tetra Tech to present an update on recent activities at the Southeast Radio Antenna Field Area, also known as Review Item Area (RIA) 110. The presentation was provided as a hand out on the table at the back of the room; selected slides are included in Attachment C. The complete presentation is available on the NAS South Weymouth web site: <http://nas-southweymouth.navy-env.com>. The following paragraphs summarize the presentation.

RIA 110 was constructed in the 1950's as an antenna site and used until the 1980's for communications with Navy aircraft. There were four antenna structures that consisted of a treated wood transformer (non-PCB) platform and ladder. The metal hardware on the antenna structures included copper sheet metal

coverings, a copper grounding system, steel support guy wires, and counter-weights and cables. There were also four light poles that were used to establish the antenna no-fly zone. The light poles were treated wood poles approximately 40 to 80 feet high. The metal hardware on the light pole structures included steel climbing pegs, steel support guy wires, and red warning lights. Slide 1 shows an antenna pole (left photo) and a light pole (right photo).

Analytical data from an EBS sampling event in 2003 and supplemental sampling in 2004 at RIA 110 were used in preparing human health and ecological risk evaluations. These evaluations identified a human health risk based on PAH and arsenic concentrations at two of the four antenna pole locations (AP3 and AP4). As a result of the identified risk, the Navy decided to perform a voluntary risk reduction removal action. A work plan was submitted in August 2008. Since some of the poles were located in wetlands, the Rockland Conservation Commission was notified of the planned activities. The objectives of this removal action were to reduce the level of risk to human health and the environment and, by removing the poles, reduce the risk of bodily harm to potential trespassers. The field activities occurred between August 27, 2008 and September 12, 2008. There were six steps involved in the work completed in the field, divided into three stages: creating an access route to the poles, felling and removal of the poles, and excavation of areas surrounding poles AP 3 and AP4 (Slide 2). Slide 3 shows the location of RIA 110 on the Base; Slide 4 shows the layout of the antenna and light poles.

The first step involved clearing and grubbing to gain access to the poles in the least intrusive way possible. A turtle corridor was created along the access route to the poles; silt fencing was installed to keep the turtles out of work areas. The work area was checked for turtles each morning prior to beginning work. Hay bale erosion controls were installed because of slightly wet areas in some parts of the site. However, the work area was not very wet during the time the work was conducted. A tree specialist was on site to help with the actual felling of the poles to avoid damage to trees in the area. The poles were cut into manageable lengths, removed using a dump truck, and loaded into a roll off. The sawdust that was created during cutting was contained and disposed of along with the treated wood poles.

After the eight poles were removed, excavation was conducted around AP 3 and AP 4 (Slide 5). The areas were excavated to a depth of 6 inches and to a radial extent of 15 feet. This generated approximately 9 cubic yards of soil that was removed from around each antenna pole location. After the excavation was completed, confirmatory samples were collected. Five samples, one from the base and four from the sidewalls, were taken from a depth of 0 to 3 inches. A waste characterization sample was also sent to a laboratory for analysis. The post-excavation samples did not exceed any MCP S-1 criteria for arsenic or PAHs. All of the excavated soil and metal and wood debris have been removed and disposed at an off-site facility. Slide 6 presents the next steps for this Site. The data from the

confirmation sample results need to be reviewed and evaluated. Based on this information, a decision document for the site will be prepared. After a No Further Action recommendation is made, the site erosion controls will be removed and the excavation areas will be allowed to be restored naturally.

M. Parsons asked what the wood was treated with. K. Myers responded that the poles were treated with creosote.

D. Galluzzo asked if the stumps were removed. K. Meyers stated that AP 1, 2, and 4 were cut to grade. AP 4 was in a wetland area and was not stable enough to support excavation so it was cut to grade. AP 3 was excavated to 3 feet below ground surface (bgs) and cut. D. Galluzzo then asked what was left behind. How deep were they? D. Barney responded that based on previous information some of the poles might have been cored into bedrock, because bedrock was at a depth of 4 feet bgs. It was decided to leave the base of the pole in place.

H. Welch asked wouldn't the base of the pole have been treated more heavily than the rest. D. Barney replied that the bottom was most likely not treated any differently than the rest of the pole.

M. Parsons commented that the wetland contains a vernal pool.

M. Skelton Roberts then introduced Phoebe Call of Tetra Tech to discuss the 5-year review. The presentation was provided as a hand out on the table at the back of the room; selected slides are included in Attachment C. The complete presentation is available on the NAS South Weymouth web site: <http://nas-southweymouth.navy-env.com>. The following paragraphs summarize the presentation.

P. Call stated that the objectives of the presentation were to describe the purpose of a 5-year review, discuss the components of the review, describe the community involvement process, describe the contents of the report, and present the schedule for completion of the 5-year review.

Under CERCLA, if following completion of a remedial action there are contaminants or hazardous substances remaining at a site above levels that allow for unrestricted exposure or unlimited use, then the remedial action must be reviewed every 5 years (CERCLA § 121(c)) to assure that the remedy is still protective of human health and the environment. The 5-year review is triggered by the date of the first remedial action at the Site (Slide 2). At the Base, the first remedial action was begun at the Rubble Disposal Area (RDA) in July 2004. Therefore, the first 5-year review is due July 2009.

The Navy is the lead agency. There is a Navy policy that directs how the 5-year review will be conducted: it references the EPA guidance. EPA is a supporting agency and will review and comment on the 5-year

review document. EPA also has to concur with the Navy's proposed protectiveness statement. MassDEP is also involved in reviewing the 5-year review.

The purpose of a 5-year review is to determine whether the remedy implemented at a site is protective of human health and the environment. This is done by answering the following three questions:

1. Is the remedy functioning as intended?
2. Are the assumptions used when the remedy was selected still valid?
3. Has any other information come to light that could call into question the protectiveness of the remedy?

The components of a 5-year review include review of site documents (e.g., Long-Term Monitoring Reports), site inspection (inspection of the landfill cap), interviews, data review, a technical assessment (using all the information gathered to answer the three questions), report preparation, recommendations and follow-up actions, and a protectiveness statement.

The focus of this first 5-year review is the RDA since it is the only site at the Base where a remedy has been implemented. However, the review will also include a status summary of all of the active CERCLA sites. The sites that will be discussed include: WGL, STP, Small Landfill, Building 81, Building 82, SRA, AOC 14, AOC 55C, AOC 83, Hangar 1. The review will also include a list of IR and AOC sites that have been completed with No Action or No Further Action (Slide 3). By 2014, the next 5-year review will include detailed evaluations of RDA, WGL, STP, Small Landfill, and maybe additional sites. Each 5-year review will build on the previous one as more Sites are closed out and, where required, remedies are implemented.

The purpose of the community involvement component of the 5-year review is to collect information about the implemented remedy and site concerns (Slide 4). For example, if trespassers are noticed, that information would be helpful in evaluating the protectiveness of the remedy. A notification that Navy is performing a 5-year review for NAS South Weymouth was placed in the three local newspapers the week of October 20th. This RAB presentation is also part of the notification process. Interviews will be conducted with SSTTDC, as well as town officials to obtain feedback on the activities at the Base, and specifically at the RDA. RAB and community members will also be interviewed. There is a questionnaire available on the back table that can be filled out and mailed to Brian Helland, or those interested can set up a time with Tom Campbell from TetraTech, who is managing the 5-year review, to do a phone interview or interview in person. The final step in the notification process will be to present the findings of the 5-year review to the RAB next year.

The report contents (Slide 5) are detailed in the EPA guidelines and include information on: site history and background; remedial action selection and implementation (from the ROD); operations and maintenance (if applicable); site inspection observations; site interviews; data review; technical assessment (address the 3 questions); any issues, recommendations and required actions; and a protectiveness statement.

Slide 6 presents the schedule for the 5-year review. The schedule anticipates that the RAB presentation of the findings of the 5-year review will take place in spring 2009. The final 5-year review report will be completed in July 2009 with copies provided to the Weymouth, Abington, Rockland, and Hingham libraries.

The EPA guidance document is called the Comprehensive Five-Year Review Guidance (OSWER No. 9355.7-03B-P; www.epa.gov/superfund/pubs.htm).

M. Bromberg asked how the 5-year review could occur without having four quarters worth of data from RDA. P. Call replied that the data used in the 5-year review will include four quarters from 2007 and 3 (maybe 4) quarters from 2008.

M. Parsons asked how long the long-term monitoring will continue at RDA. D. Barney said it was currently scheduled for 30 years, 28 years remaining, but the duration can change based on the gathered data. P. Call noted that after 2 years of quarterly monitoring, the long term monitoring program changes to semi-annually monitoring. The 5-year review document may recommend dropping some analyses based on the lack of detections of some analytes consistently seen at the RDA in the past eight quarterly rounds. P. Call commented that every time there is a quarterly sampling event the physical condition of the landfill cap is checked (e.g. a facility inspection is performed), and the gas probes and gas vents are monitored.

A question was asked if the east-west parkway is going to affect the RDA. D. Barney responded, not to his knowledge.

H. Welch stated that different things could show up at different times, and he doesn't think it is a good idea to stop monitoring for certain parameters, even if they have not been present. P. Call responded that the regulators will have to agree with any recommendations the Navy makes. She noted that the potential for different conditions in different seasons is one of the reasons that long-term monitoring typically starts out with quarterly monitoring, so you can make informed decisions about what is going on at the Site. The complete list of parameters has been included for all RDA quarterly rounds to date and the analytical results, as well as the data from the remedial investigation, should help in determining

contaminants of concern and limiting the required analytical analyses with confidence. D. Barney suggested also just changing the frequency of analysis to help collect data to eliminate a parameter but not waste money with repetitive sampling.

M. Parsons stated that this was an unlined landfill. She asked how deep the monitoring wells are. D. Barney stated that some go into bedrock and some are screened across the water table (approximately 2 to 12 feet bgs for the water table and 25 to 35 feet bgs for the deeper wells).

M. Parsons asked if there was a possibility that there were things going below the well screens that could be reaching Old Swamp River. D. Chaffin stated that there are chemicals being detected that are reaching the river, but the river surface water is being sampled as well. The main problem at this site is manganese being liberated by what is contained within the landfill. He noted that the iron floc is surprisingly not as bad in this area as other areas, even with the high manganese concentrations. He stated that it is a good monitoring well network and the sediment and surface water samples target places where there is some iron staining.

M. Parsons asked if the wells in Old Swamp River are included in the monitoring rounds. D. Barney stated that the information collected during the quarterly events will be used for the 5-year review. The furthest downstream sample is on the other side of the bridge (culverts). There is also an upstream location, as well as surface water samples collected closer to the landfill. [Note: surface water, not groundwater from monitoring wells, is sampled in Old Swamp River.]

D. Galluzzo stated his concern about question number 3 (has any other information come to light that could call into question the protectiveness of the remedy?) and that leasing the land to the developer changes the situation that was in place when the remedy was decided upon. Based on the recent events with the economy it should be confirmed that LNR can afford the clean-up. He asked that this please be considered in the evaluation of protectiveness. B. Olson stated that he agrees and ultimately the Navy is responsible, so even if LNR cannot afford the clean-up process, the Navy will have to continue to ensure the protectiveness of human health and the environment.

M. Bromberg asked the regulators if anything had come to light that is concerning to them. B. Olson stated that the biggest thing is metals in groundwater, but that is not really a surprise. M. Bromberg asked about PCBs. B. Olson stated that they had not really been seen since the hot spot was removed (during implementation of the RDA remedial action). D. Chaffin stated that they need to see 7 or 8 rounds to assess protectiveness, to try and capture the full range of releases if that is the case. With this number of rounds the seasonal changes and water level changes can be evaluated with respect to the data.

M. Bromberg stated that he felt it was too early to ask questions of the public if not all the data and reports were available. B. Olson stated that the EPA looks at recommendations in 5-year reviews to assess the progress in making the remedies as protective as possible, and the public's opinion can be helpful.

It was suggested that a presentation on the existing RDA data may be helpful.

M. Byram asked if anyone had noticed a trend of the water table rising. D. Barney stated that the water table fluctuates from season to season, but an assertion cannot be made after only 2 years of monitoring on whether or not the water table is rising. S. Ivas noted that if you look on the Internet for the USGS Weymouth monitoring wells you can look up long term and short term data trends for the wells that they monitor on a consistent basis in the area.

M. Marques wants someone to talk about the overall health risk. D. Chaffin stated that the point of the 5-year review is to address this: the protectiveness statement really is a statement of human health and environmental risk. That is the objective of this whole process.

B. Olson stated that their job was to get the Site to the point where there are no risks. The EPA believes that there are no present day risks at RDA. There could be a future risk, if there is nothing done to the Site and if, for example, houses were built at the Site.

3. UPDATES AND ACTION ITEMS

M. Skelton Roberts stated there were no Action Items. She then asked each of the Leads to provide updates to the list of Update Items.

RAB Administrative Actions: D. Barney stated that there were no updates.

MassDEP Update: D. Chaffin stated there was no update.

Coast Guard Update: D. Barney received no update.

IR Program Site Update: D. Barney stated that in the September/October minutes there is an update that summarized most of the ongoing actions. The WGL work will be taken over by LNR and reported on by others after closing.

MCP Update: All RTNs are closed; only the Basewide RTN remains open. Approximately 37 MCP sites have been closed.

EBS Update: D. Barney stated that there have been various removal actions completed. The AOC 60 and 61 RODs are in progress, and comments are being addressed in a responsiveness summary. Information on the remaining RIAs is being gathered so decision documents can be prepared.

FOST/FOSL Update: FOSTs 3, 4, and 5A are complete and are now available in the local information repositories. The FOSL is finalized and awaiting execution.

SSTTDC Update: Jim Young stated that roads and utilities for the first phase of development have been installed. Over the next couple of weeks they will be running through the final punch list. The site plan has been reviewed for vertical development, which consisted of a total of 337 apartment units (base wide). There are no current site plan applications under review at this time. Additional water quality permits have been received from the Army COE and MassDEP (401/404). Natural Heritage also helped develop the permits. The new SSTTDC website should be live within 2 to 3 weeks.

D. Galluzzo asked S. Ivas about the situations that have developed in the marketplace and the impact on the project. S. Ivas responded that he could not answer the question and suggested that D. Galluzzo ask the question at the bi-weekly SSTTDC meetings. J. Young stated that the schedule for the meetings is on the SSTTDC website or you can call Mary Cordero (Administrative Assistant) at 781-682-2187. Generally the meetings are the second and fourth Monday of every month and the public is always invited. He suggested calling to confirm the schedule during the holiday season as meeting dates may shift.

M. Bromberg asked about the retention pond by the fuel farm that has iron floc. Is it a water quality issue that has to be taken care of by the stormwater regulations? S. Ivas stated that to his knowledge stormwater regulations do not address iron floc in water. J. Young stated that he will check the order of conditions.

M. Skelton Roberts suggested pulling together all the questions on the attachment of the September letter and previous questions discussed at the September RAB and discuss them all at the January RAB.

M. Bromberg asked how the Massachusetts National Heritage is involved. S. Ivas stated there is a Conservation and Management permit that has to be obtained from Natural Heritage. They are working with them to mitigate habitat lost during development. There is current sparrow habitat that will be developed as parkway, thus another area of the Base is going to be developed as grassland for sparrow

habitat. There are also turtle habitat issues, the amount of nesting area for turtles will be increased on the Base. The forest types will be changing a small amount around existing habitats, through an order of conditions permit. This work is being done under a conservation permit.

Action Item: Determine the amount of increased natural habitat acreage. J. Young stated that the details are in the natural habitat permit and that SSTTDC can make that available.

M. Parsons asked if the developer was going to use the Navy storm water system when there are "rivers of floc."

H. Welch asked where their water was coming from and he wanted a description/information on the new water treatment plant.

M. Bromberg suggested having a RAB meeting in December. Suggested topics include the SRA, RDA sampling results. He suggested postponing the interviews till after the presentation. D. Barney stated that there is a wish to get the interviews done early to incorporate comments in the draft document, but he does not want to limit anyone from being able to comment. D. Barney stated that the SRA RI report comments from the agencies have been received. He believes it would best to wait until the comments have been reviewed and discussed with the agencies.

M. Bromberg asked how long the RAB meetings will continue. D. Barney stated that the Navy will continue to participate in the RAB meetings. There are other sites on the Base that the Navy continues to be responsible for. At a transition point the presentations will eventually fall to the developer, but the Navy would still maintain a presence and involvement in that process.

Conclusion/Next Meeting

M. Skelton-Roberts wrapped up the meeting. The next RAB meeting will be the second Thursday in January (January 8). The group will provide answers to questions based on issues in the September letter.



**Naval Air Station South Weymouth
Weymouth, MA
Restoration Advisory Board
RAB Meeting Agenda**



November 13, 2008

Conference Center on Shea Memorial Drive

7:00 PM

<i>Agenda Items</i>	<i>Item Lead</i>	<i>Projected Time</i>
1. Introduction, Review of Meeting Notes	Facilitator	7:00 - 7:15
2. RIA 110 (Southeast Antenna Field) Update	Navy	7:15 – 7:45
3. NAS South Weymouth 5-Year Review	Navy	7:45 – 8:15
4. Updates and Action Items	Navy	8:15 – 8:30
5. Questions, Agenda Items, Next Meeting	Facilitator	8:30 – 9:00

Facilitator: Mary Skelton-Roberts, Massachusetts Office of Dispute Resolution & Public Collaboration

Restoration Advisory Board (RAB) Members:

Abington: James Lavin, (Alternate: Steve Ivas); Phil Sortin (Alternate: Beth Sortin)

Hingham: no current representation

Rockland: no current representation

Weymouth: James Cunningham (Community Co-Chair); Ken Hayes; Dan McCormack; Steve White

Navy: Dave Barney (Navy Co-Chair)

EPA: Kymberlee Keckler (Alternate: Bryan Olson)

MA DEP: David Chaffin (Alternate: Ann Malewicz)

BRAC Cleanup Team (BCT) Points of Contact:

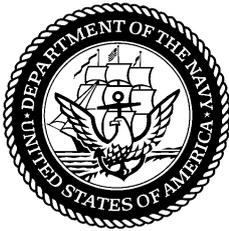
Navy: Dave Barney, BRAC Environmental Coordinator, Base Realignment and Closure Office, Program Management Office, Northeast (617) 753-4656
Email: david.a.barney@navy.mil

Brian Helland, Remedial Project Manager, Base Realignment and Closure Office, Program Management Office, Northeast (215) 897-4912
Email: brian.helland@navy.mil

MassDEP: David Chaffin, Environmental Engineer, Federal Facilities (617) 348-4005
Email: david.chaffin@state.ma.us

EPA: Kymberlee Keckler, Remedial Project Manager, Federal Facilities Section (617) 918-1385 Email: keckler.kymberlee@epa.gov

MassDEP Ombudsman: David DeLorenzo (617) 292-5774, Email: david.delorenzo@state.ma.us



Naval Air Station South Weymouth Restoration Advisory Board Action Item Tracking List



November 13, 2008 – Next RAB Meeting

Action Item	Item Lead	Deadline
ACTION ITEMS		
None.		
UPDATES		
RAB Administrative Actions	D. Barney	Each RAB
MA DEP Update	D. Chaffin	Each RAB
Coast Guard Buoy Facility Update	R. Marino	Each RAB
IR Program Sites Update	D. Barney	Each RAB
MCP Release Areas Update	D. Barney	Each RAB
EBS Review Item Areas/ Various Removal Action Update	D. Barney	Each RAB
FOST/FOSL Update	D. Barney	Each RAB
SSTTDC Update	J. Lavin/ S. Ivas	Each RAB
COMPLETED ITEMS		
Provide various maps with perimeter streets and an acronym list. (10/08)		
Review suggestions to enhance the public participation process. (9/08)		
Provide FOST 3 and 4 Responsiveness Summaries to M. Bromberg (9/08)		
Send email announcing availability of FOST 5A for review (9/08)		
Discuss the parties involved in the cleanup and development of the Base (9/08)		
Provide suggestions to improve the public participation process. (6/08)		
Check location/depth of peat moved to south end of runway. (5/08)		
Determine Navy's role in the Enabling Legislation. (5/08)		
Provide the AOC 55C HHRA to A. Hilbert, J. Rakers, H. Welch. (3/08)		
Investigate issues with movement of peat during development. (1/08)		
Provide copies of EPA health risk requested by M. Bromberg. (1/08)		
Review routing of piping between STP Site and French Stream. (11/07)		
Provide location of Basewide Assessment floc samples. (10/07)		
Provide copies of parking lot response letter. (10/07)		
Provide groundwater data for transferred land (10/07)		
MDPH MS Study update (8/07)		
List of AULs; what and where they are (4/07)		
Provide vernal pools map to J. Cunningham (4/07)		
Copies of figures from Old Swamp River Study by Beta Group, Inc (03/07)		
Provide Hydrogeologic Investigation Tech Memo to D. Galluzzo (03/07)		
Distribute monthly Navy program status/administrative items update (03/07)		
Provide blueprint of old STP to H. Welch (01/07)		
Distribute monthly Navy program status/administrative items update (01/07)		
Check status of NAS South Weymouth website (01/07)		
P. Scannell to provide the reference for the 1995 EPA study to D. Barney (11/06)		
Distribute monthly Navy program status/administrative items update (11/06)		
Were runways in the transferred land tested for fuel oil and PCBs? (11/06)		
1997 DEP letter re: non-potable drinking water source areas on the Base (11/06)		
Map showing sampling locations on the Base (11/06)		
Old Swamp River additional sample collection; data available? (11/06)		
Status of release of MDPH ALS/MS study (11/06)		



2008 Review Item Area 110 -
Southeast Radio Antenna Area
Field Activities
November 13, 2008



RIA 110 Background

- Radio antenna site, including antenna and light poles, in use from the 1950s to 1980s for communications with Navy aircraft.
- Antenna Structures - 4
 - Treated wood transformer (non-PCB) platform and ladder
 - Treated wood poles - approx. 80 ft to 100 ft tall
 - Metal hardware - copper sheet metal coverings, copper grounding system, steel support guy wires, counter-weights and cables



Typical Antenna Pole Configuration



RIA 110 Background (continued)

- Light Poles - 4
 - Used to establish antenna no-fly zone
 - Treated wood poles - approx. 40 ft to 80 ft tall
 - Metal hardware - steel climbing pegs, steel support guy wires, red warning lights



Typical Light Pole Configuration



RIA 110 Background (continued)

- Analytical data collected during a March 2004 sampling event were used to evaluate the need for additional activities at RIA 110.
- 2004 risk evaluation identified risk at AP 3 and AP 4 due to PAH and arsenic concentrations.
- Navy decided to perform a voluntary risk-reduction removal action.



RIA 110 Background (continued)

- TtEC Work Plan submitted in August 2008.
- Rockland CONCOM notified of the planned activities (i.e. some antenna poles located in wetland areas).



Objectives

- The goal of these activities was to reduce the level of risk to human health and the environment.
- The secondary goal was to remove the antenna and light poles to reduce the risk of bodily harm to potential trespassers.

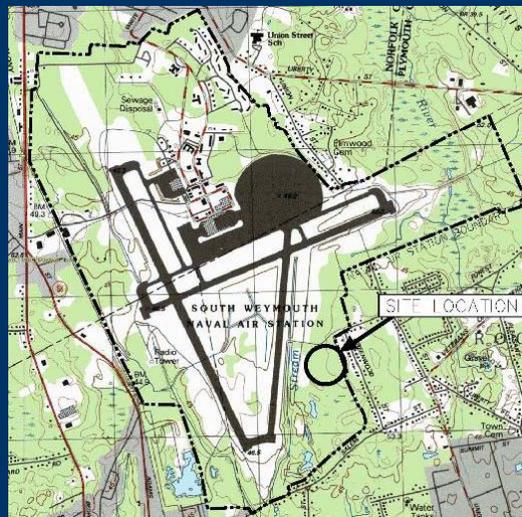


2008 Field Activities

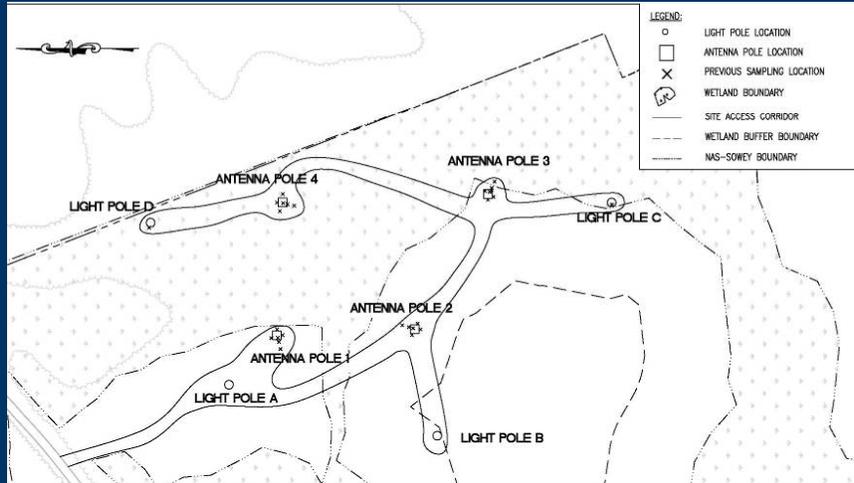
- August 27 – September 12
- 6 Steps
 - Step 1 – Clearing/grubbing access roads
 - Step 2 – Installation of silt fence/turtle corridor
 - Step 3 – Installation of erosion control around wetlands
 - Step 4 – Felling of antenna/light poles
 - Step 5 – Removal of poles from area
 - Step 6 – Limited excavation at AP 3 and AP 4



Location of RIA 110



Tower Configuration



Step 1 - Clearing/Grubbing



Step 2 – Turtle Corridor



Step 3 – Erosion Control



Step 4 – Pole Felling



Step 5 – Removal of Poles



Step 6 - Excavation



Confirmatory Sample Collection

- Five confirmatory samples were collected from 0 inches to 3 inches below the base of each excavation (one from each sidewall and one from the base).
- These confirmatory samples (along with waste characterization samples) were sent off-site for laboratory analysis.



Summary

- All antenna and light poles removed (total of 8 poles).
- Post-excavation samples did not exceed MCP S-1 PAH/arsenic criteria.
- Soils and wood/metal debris (guy wires, supports, etc), have been removed and disposed of at an off-site facility.



Next Steps

- Complete the review/evaluation of the confirmation sample results.
- Prepare and submit the decision document for the site.
- Remove site erosion controls and allow excavations to restore naturally.

