

NASJRB WILLOW GROVE RAB MEETING MINUTES

Meeting Date: September 16, 1998
Meeting Time: 6:00 p.m. – 8:20 p.m.
Meeting Place: Navy Conference Room, Building 1, NASJRB Willow Grove

	<u>Name</u>	<u>Organization</u>
Attendance:	Mary "Liz" Gemmill	RAB Member (Co-Chairperson)
	Eric Lindhult	RAB Member
	John C. Martin	RAB Member
	Ray Leopold	RAB Member
	Clifford Mars	RAB Member
	Richard Peffall	RAB Member
	Kaye Maxwell-Martin	RAB Member
	Jane Beddinger	RAB Member
	Jack Dunleavy	RAB Member
	Barbara Curtis	Former RAB Member
	Michael Sievers	Guest
	Jim Edmond	NASJRB Willow Grove
	CDR Terray Wood	NASJRB Willow Grove (Co-Chairperson)
	LCDR Mark Leemaster	NASJRB Willow Grove
	Col. Charles Ethredge	ARS Willow Grove
	Hal Dusen	ARS Willow Grove
	Charanjit Gill	ARS Willow Grove
	James Colter	NORTHDIV
	Debbie Felton	NORTHDIV
	Russell Turner	Tetra Tech Nus, Inc
	Kevin Kilmartin	Tetra Tech Nus, Inc
	Darius Ostrauskas	EPA
	William Hudson	EPA
	Pamela Reigh	PADEP
	April Flipse	PADEP

Jim Edmond opened the meeting by welcoming all participants. Mr. Edmond introduced Kay Maxwell-Martin, who is replacing Barbara Curtis as the RAB representative for General Instruments, and Colonel Charles Ethridge, Commander of the Air Force ARS/913 Airlift Group based adjacent to NASJRB Willow Grove.

Jim Colter, the Navy remedial project manager, stated that the primary purpose of this RAB meeting was to report the results of the Navy's Phase II Remedial Investigation (RI). Mr. Colter introduced Russ Turner of Tetra Tech NUS, NorthDiv's environmental contractor for the RI work.

Mr. Turner presented the results, conclusions and recommendations from the Phase II RI report. A copy of the presentation slides is attached. At the suggestion of Darius Ostrauskas, the EPA remedial project manager, a discussion period was held at the conclusion of the presentation for each site.

Site 1 – The Privet Road Compound

Regarding the Navy's recommendation for future actions at Site 1, Jack Dunleavy asked exactly what was meant by "widening the groundwater investigation." Mr. Colter replied that the Navy will expand the investigation for potential sources of volatile organic compounds (VOCs) beyond the boundaries of Site 1. The recent Air Force groundwater investigation results and historical records of activities in the area of

the current Public Works Building (among other potential data sources) will be examined (or re-examined).

There was a discussion of the Navy's proposed removal action for the soils impacted by PCBs at Site 1. Eric Lindhult asked what would be the action level that would trigger the soil removal at any particular location. In response, Mr. Colter distributed a copy of the draft Action Memorandum for the soil removal, and stated that the Navy was proactively planning to remove any soils that contained greater than 1 part per million (ppm) of PCBs. Mr. Colter explained that this level was well below any regulatory or risk-based levels governing PCBs in soils. Commander Wood stated that through this action, the Navy would remove any perceived risk as well as actual risk. A copy of the Action Memorandum is included as an attachment to these minutes. Comments on the Action Memorandum are requested within 30 days to support the aggressive proposed removal schedule.

Mr. Lindhult noted that relatively few surface water or sediment samples appeared to have been taken from the drainage swale located north of the bowling alley, and questioned if this pathway was adequately characterized. Mr. Colter replied that the combination of the Phase II RI samples with the samples taken during previous investigations produced a sampling history and database that were sufficient to adequately characterize the site.

John Martin asked if records existed concerning the volume of PCBs dumped at the site. Mr. Edmond replied that there were historical accounts of two PCB spills from transformers that were staged in this area, and the total volume of oil spilled (only a fraction of which was actually PCBs) was probably about 10 – 15 gallons. Mr. Colter added that PCBs are readily adsorbed by soil, which explains why the PCB impacts at the site are generally limited to the surface and very shallow subsurface soils.

Mr. Ostrauskas offered several preliminary comments on behalf of EPA, but noted that the agency was still assembling its final review comments of the Phase II RI report. Mr. Ostrauskas stated that the Navy and EPA will jointly decide on all site actions. Mr. Ostrauskas stated that EPA agreed that groundwater at Site 1 posed an unacceptable risk and agreed that additional work is needed because at present there was insufficient data with which to proceed to the feasibility study (FS). Mr. Ostrauskas noted that EPA agreed with the soil removal action, and clarified an earlier discussion by adding that the determination of acceptable versus unacceptable risk in the soil is often governed by the use of the land. Mr. Ostrauskas concluded by stating that EPA would not decide if it agreed that no further work was necessary for site soils until the agency had completed its review of historical aerial photographs of the site.

Ms. Curtis questioned the decision of off-site disposal of the soils versus the option of on-site treatment. Mr. Colter replied that the decision basically came down to the cost considerations of the various options, and added that these comparisons were included in the action memorandum. Mr. Colter stated that excavation and off-site disposal was the preferred alternative due to the small volume of soil to be removed and the low concentrations of PCBs in the soil.

Site 2 – The Antenna Field Landfill

John Martin asked if the conclusions reached by the Navy signified the end of investigations at this site. Mr. Colter replied that the Navy is recommending a decision for No Further Action, but was still waiting for regulatory review and comment. Mr. Ostrauskas stated that EPA agreed with the report's conclusions regarding groundwater, but added that the agency had not yet received review comments from the Biological Technical Assistance Group (BTAG), which may have ecological concerns regarding some of the pesticide levels detected at the landfill. In response to a question, Mr. Ostrauskas noted that the BTAG group was composed of ecologists from the U.S. Fish and Wildlife Service, the National Oceanographic and Atmospheric Administration (NOAA), and EPA staff.

Site 3 – The Ninth Street Landfill

John Martin asked if any off-site wells had been sampled. Mr. Turner replied that some VOCs (about 15 ppb of the chlorinated solvent PCE) had been found in the relatively shallow (75 foot) artesian well located on the adjacent golf course, and added that no VOCs were detected in the other golf course well sampled. Mr. Colter mentioned that the facility (NASJRB Willow Grove) had performed an off-base well discovery operation and had sampled some of the home wells closest to the facility boundary. One of these wells had contained a chlorinated VOC compound at a level lower than the Federal drinking water limit.

Mr. Dunleavy asked if it was known where the pond water originated. Mr. Edmond replied that the pond receives runoff from the airfield.

Mr. Ostrauskas stated that the Navy needed more complete information regarding the number and location of off-base well users, since off-site migration of VOCs in groundwater had been documented. Mr. Ostrauskas encouraged the RAB members and the community to help in this well search by contacting the Navy with any information regarding the presence and depth of wells. Mr. Ostrauskas stated that there appeared to be enough information to proceed to a feasibility study, but added that the remedy would probably be classified as interim due to the existing data gaps and questions regarding additional source areas and the full nature and extent of the groundwater plume. Mr. Ostrauskas concluded by noting that the sole goal of an interim remedy is to limit the groundwater migration, and that preliminary remediation goals (PRGs) typically are not developed for an interim remedy.

Liz Gemmill asked if the Navy knew where the groundwater was migrating. Mr. Colter replied that the Navy knew the general directions of groundwater flow, and added that securing off-site access or permission from the adjacent property owners had been and would be a significant obstacle to the performance of any additional off-site investigation.

Site 5 – The Fire Training Area

Mr. Ostrauskas stated that EPA agreed that it is reasonable to proceed to a feasibility study for groundwater, although any remedy would be interim because the nature and extent of the plume are still apparently undefined. Mr. Ostrauskas stated that EPA believes that the existing data do not rule out the potential for off-site migration of the groundwater plume, and recommended that the Navy more thoroughly identify all potential off-base groundwater users near this site. Mr. Colter pointed out the results from the newest monitoring well cluster recently installed (after the issuance of the RI report) between Site 5 and the off-base well users, and stated that these data indicate that the groundwater plume has not migrated off base. Mr. Ostrauskas noted that EPA could not fully comment on Site 5 then, because these data were not included in the RI report but were used for the Site 5 interpretation. Mr. Colter replied that the Navy did not wish to issue another iteration of the draft RI report, and requested that EPA comment on the RI report as issued, as these new data would be used for the reply to comments and ultimately integrated into the final RI report.

John Martin noted that even in local municipalities, the historical disposal of waste was largely undocumented or the records were very poor, and he asked if the Navy had a database that recorded where historical on-base waste disposal occurred. Mr. Colter explained the Installation Restoration (IR) program initially employs processes such as historical aerial photographs and interviews with long-time employees to determine where former (and possibly unrecorded) disposal areas may exist on Navy bases. Mr. Edmond added that historical aerial photographs for the Willow Grove NASJRB document disposal sites as early as the 1940's.

General Comments and Discussion

Mr. Colter stated that the Navy would like to receive all comments on the RI report from the RAB within the next 30 days, and requested the RAB's input regarding the prioritization of the Navy's proposed future activities that were presented at this meeting.

John Martin asked if the Navy's investigations stop at the base fenceline. Mr. Colter replied that the Navy extends their investigations to the off-site areas where evidence indicates that environmental impacts have migrated off site, and he noted that this had already occurred at Site 3. Mr. Colter reiterated that obtaining site access from off-base property owners would probably continue to be a significant obstacle to the Navy in performing these additional studies.

Bill Hudson, the EPA Community Involvement Coordinator, expressed EPA's desire to make sure that the RAB is serving its purpose at this base. Mr. Hudson distributed a list of RAB responsibilities at DOD facilities to the meeting attendees. A copy of this handout is included in the attachments to these minutes. Regarding this presentation, Commander Wood noted that a good meeting structure is required to ensure that factual information is being presented to the community.

Rich Peffall asked if Congress established EPA's internal structure or if the structure was determined by EPA. Mr. Ostrauskas and Mr. Edmond replied that EPA's structure was determined by and is a result of various environmental laws passed by Congress.

Mr. Edmond solicited suggestions for the next RAB meeting agenda, and noted that the Air Force had requested some time to present the results of its investigation at the Washrack Area. Mr. Lindhult suggested that the RAB review the comments submitted on the Phase II RI report. Mr. Colter noted that the Navy could have draft responses to comments ready for the meeting if the comments were submitted within the next 30 days.

Bill Hudson noted that the attendance at the RAB meetings appeared to be decreasing. Mr. Edmond noted that at least four members had contacted him prior to the meeting to express regrets at missing the meeting due to prior commitments.

Rich Peffall sparked a general discussion about concern that the RAB meetings may be too technical, and that the community might be more responsive to less technical meetings. Mr. Hudson suggested that the meetings might not be too technical, but they were too long. It was concluded that the various military and regulatory personnel would discuss options for structuring subsequent meetings so that all RAB members feel included and can contribute.

The next RAB meeting was scheduled for December 9, 1998, at 6:00 p.m.

The meeting was adjourned.

NASJRB WILLOW GROVE

SUMMARY OF REMEDIAL INVESTIGATION RESULTS AND RECOMMENDATIONS



WHY NOW?

THE NAVY'S INSTALLATION
RESTORATION PROGRAM
FIELD INVESTIGATION PHASE
AT FOUR PRIORITY SITES
HAS BEEN COMPLETED.

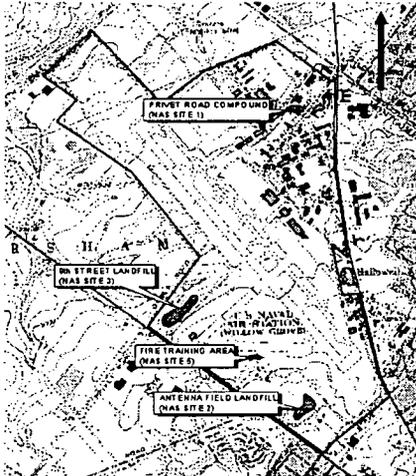
OBJECTIVES OF THIS PRESENTATION

Summarize Phase I RI Activities

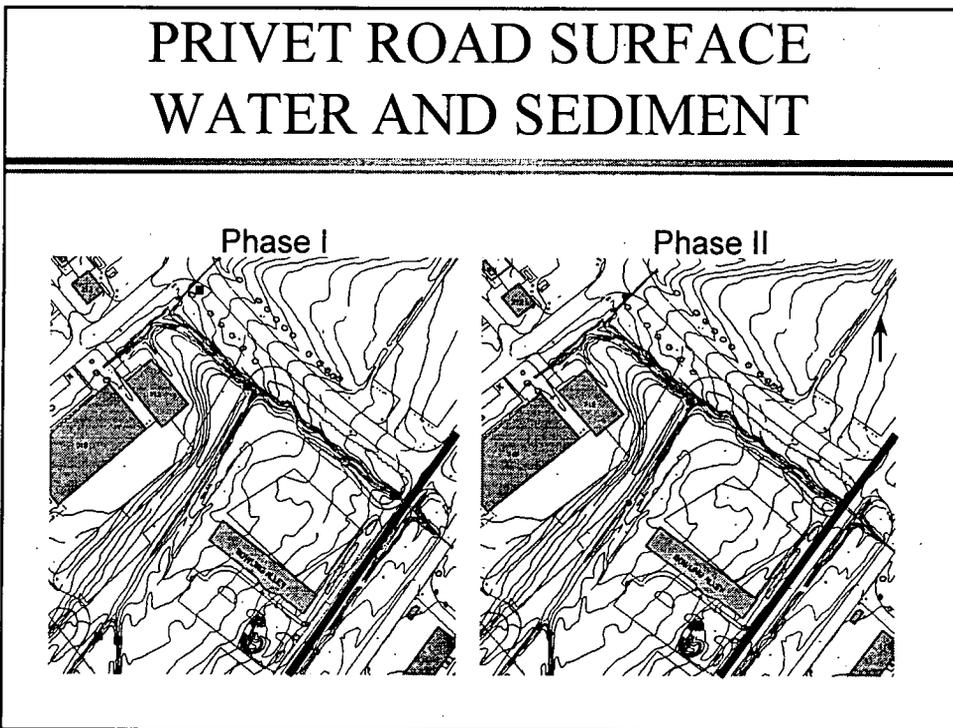
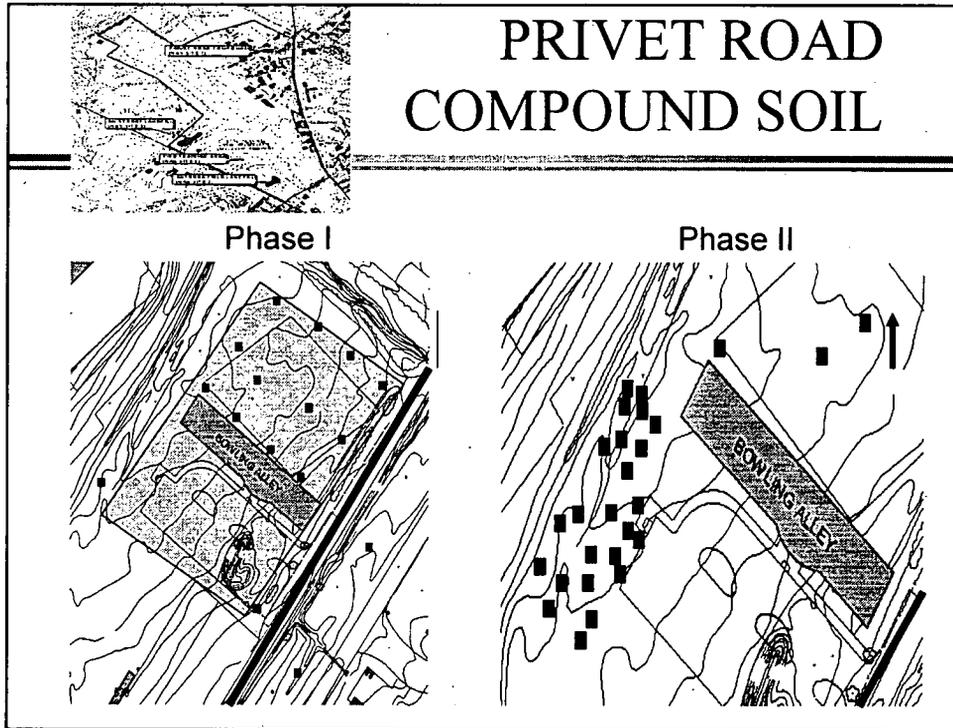
Summarize Phase II RI Activities

Present and Discuss the Navy's Recommendations

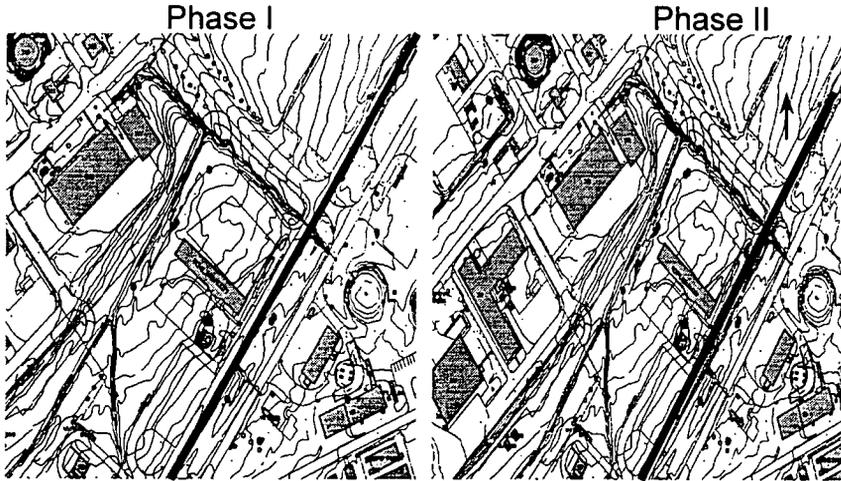
SITE LOCATIONS



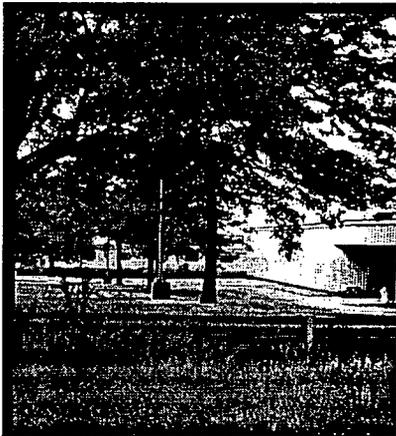
- Site 1 - Privet Road Compound
- Site 2 - Antenna Field Landfill
- Site 3 - Ninth Street Landfill
- Site 5 - Fire Training Area



PRIVET ROAD COMPOUND GROUNDWATER SAMPLES



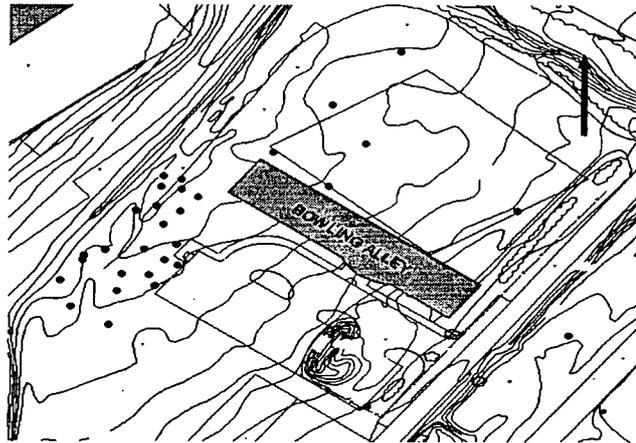
FOCUS AT PRIVET ROAD COMPOUND AREA



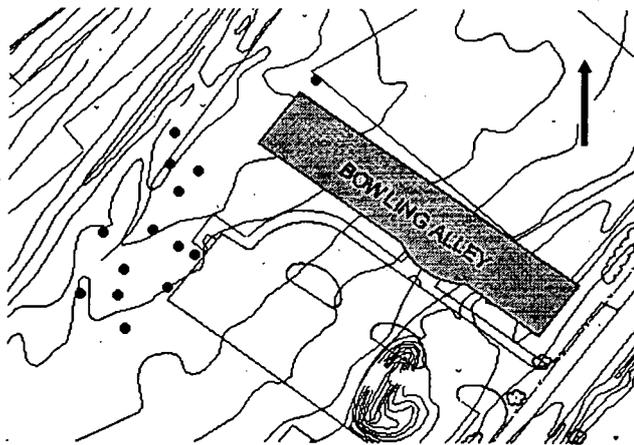
PCBs IN SOIL

VOCs IN
GROUNDWATER

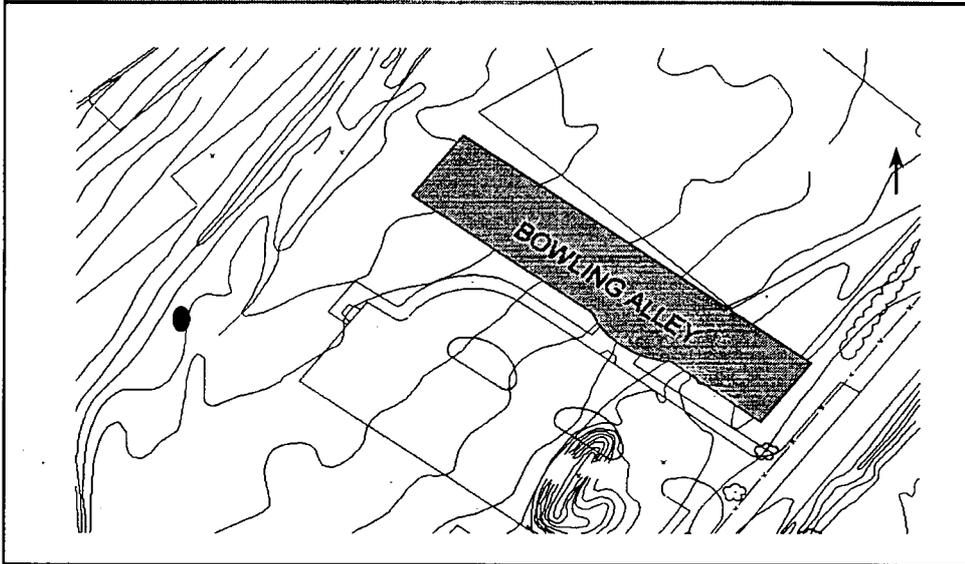
PCBs IN SOIL
1 to 10 PPM



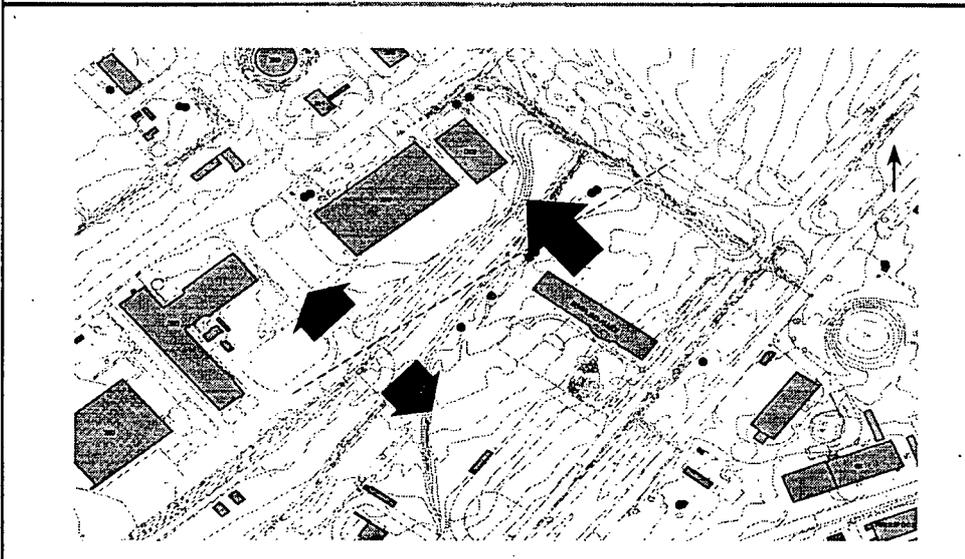
PCBs IN SOIL
10 to 25 PPM



PCBs IN SOIL GREATER THAN 25 PPM



VOCs IN GROUNDWATER



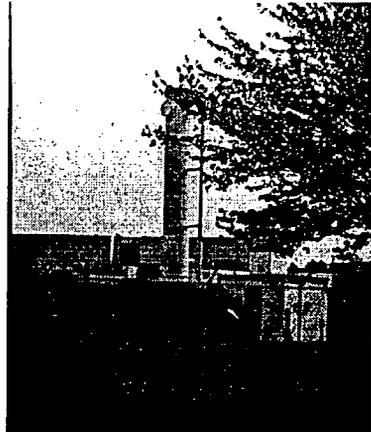
CONCLUSIONS

PCBs IN SOIL ARE A POTENTIAL RISK TO FUTURE RECEPTORS.

VOCs IN GROUNDWATER REQUIRE FURTHER CONSIDERATION.

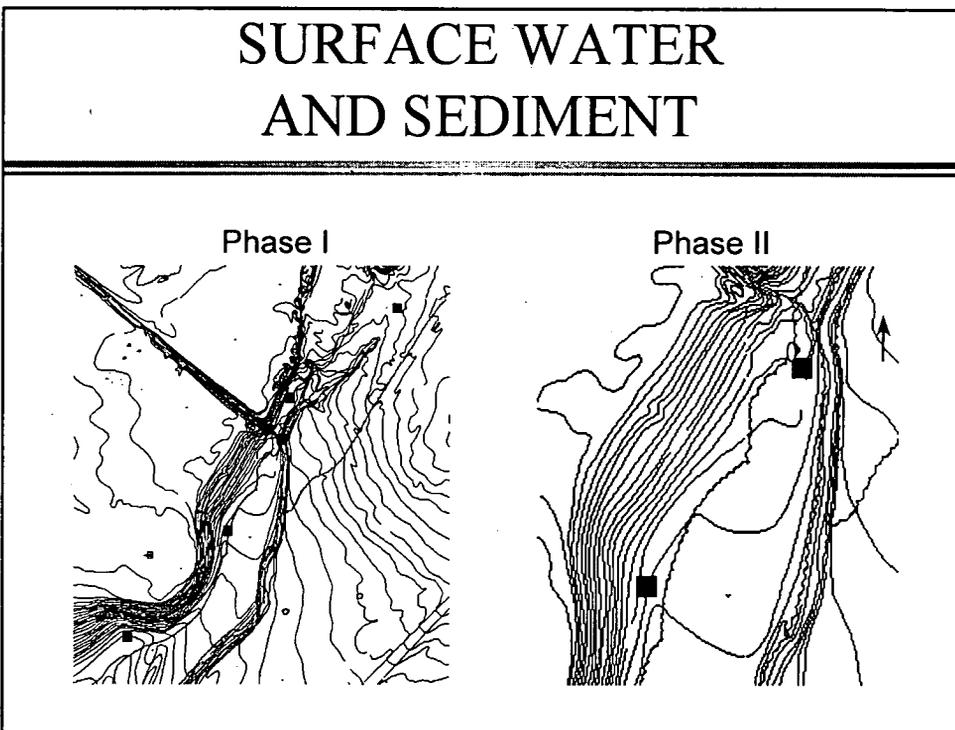
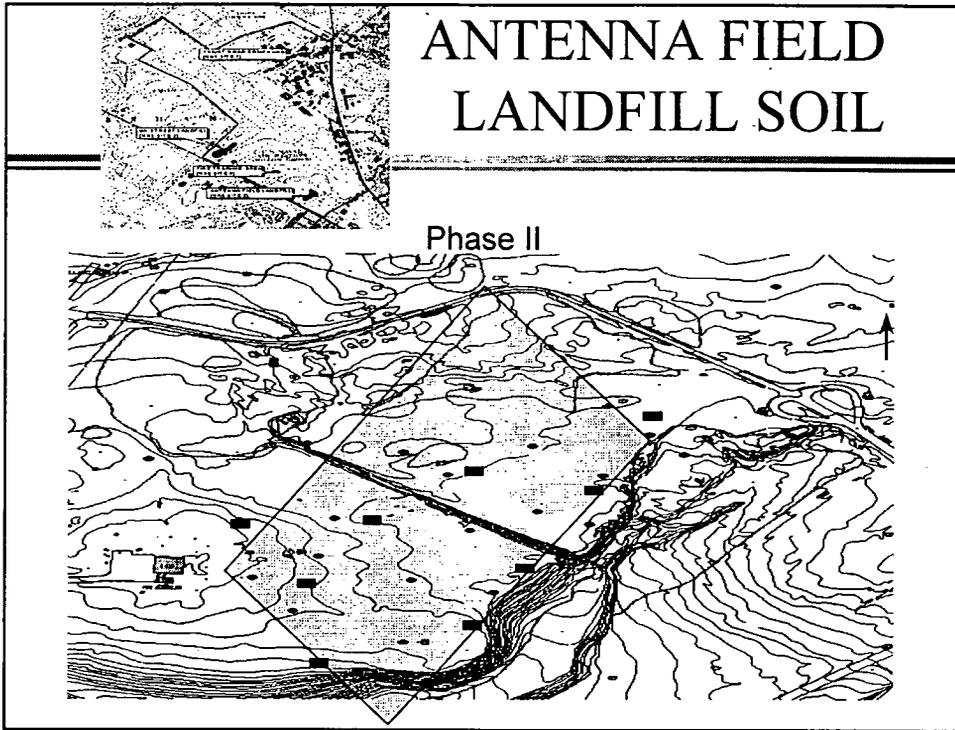
COMPOUNDS AT SITE DO NOT THREATEN ECOLOGICAL RECEPTORS.

RECOMMENDATIONS FOR PRIVET ROAD COMPOUND



REMOVAL ACTION
FOR PCB-
CONTAINING
SOILS

WIDEN
GROUNDWATER
INVESTIGATION

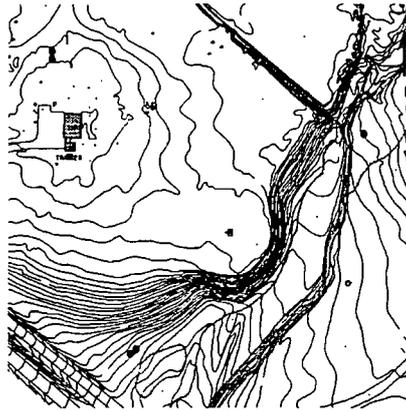


ANTENNA FIELD LANDFILL GROUNDWATER SAMPLES

Phase I



Phase II



CONCLUSION

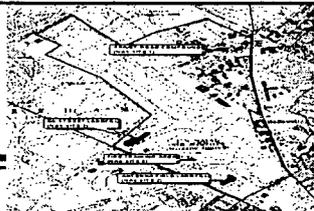


ANTENNA FIELD
LANDFILL SITE
DOES NOT POSE A
THREAT TO
HUMAN OR
ECOLOGICAL
RECEPTORS

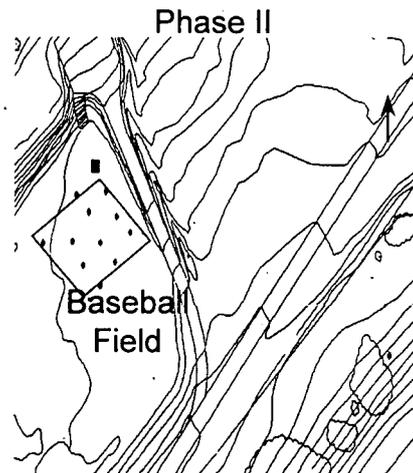
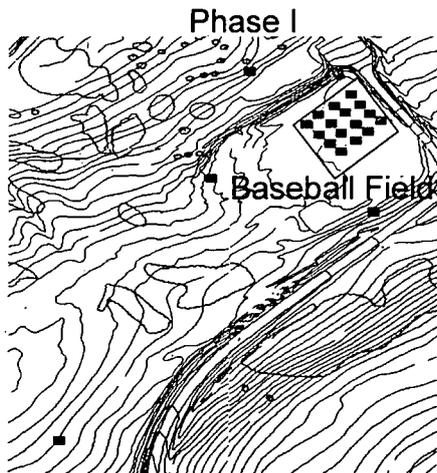
RECOMMENDATIONS

NO FURTHER ACTION IS
RECOMMENDED FOR SURFACE
SOIL, SURFACE WATER OR
SEDIMENT.

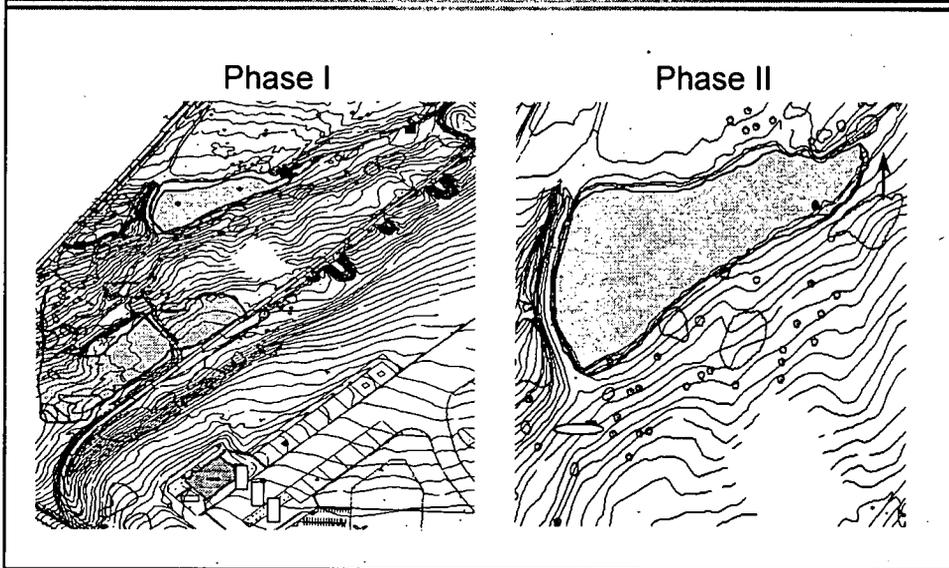
NO FURTHER ACTION IS
RECOMMENDED FOR
GROUNDWATER.



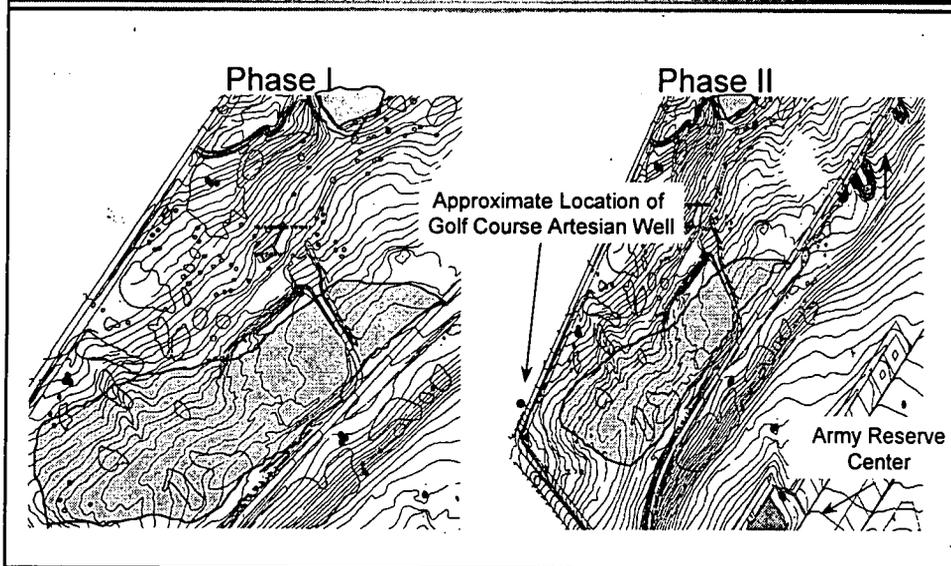
NINTH STREET LANDFILL SOIL



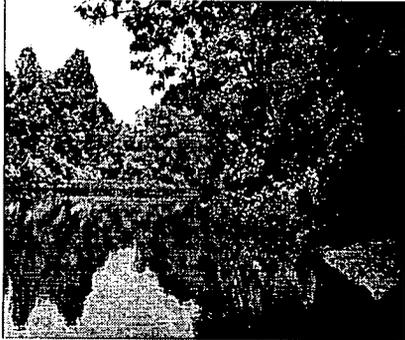
SURFACE WATER AND SEDIMENT



NINTH STREET LANDFILL GROUNDWATER SAMPLES



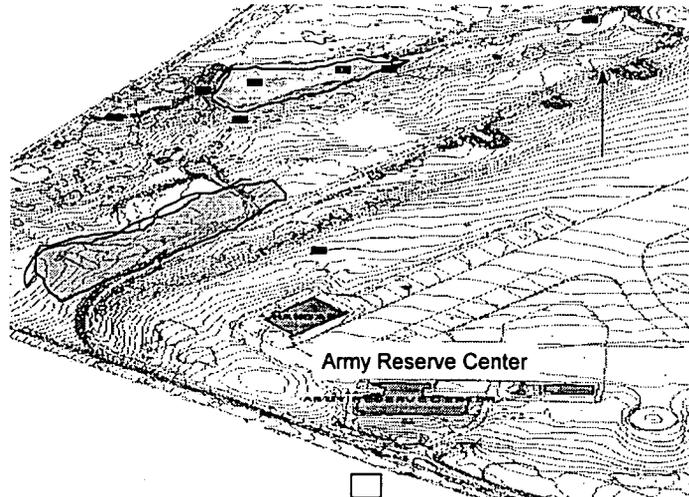
FOCUS AT NINTH STREET LANDFILL



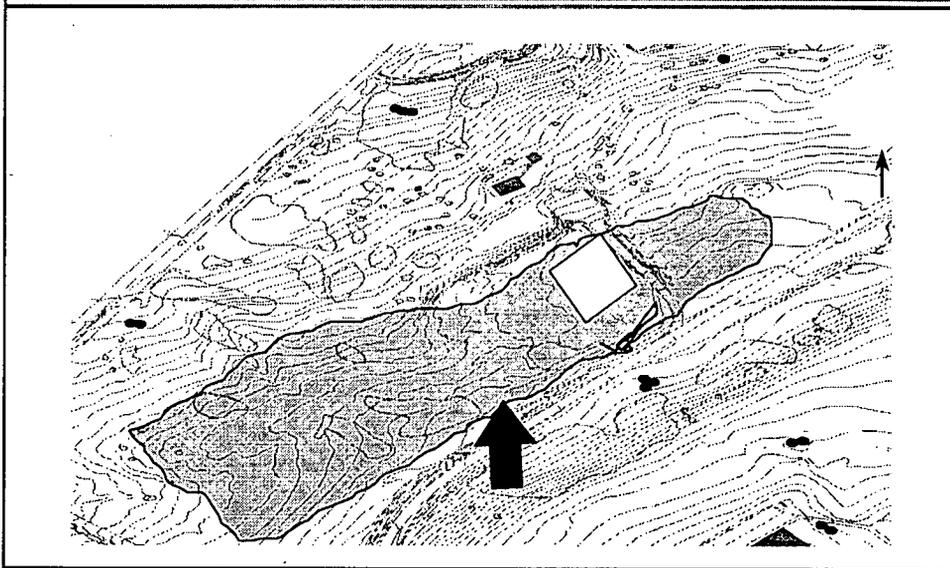
ECOLOGICAL RISKS
FROM POND
SEDIMENTS

VOCs IN
GROUNDWATER

ECOLOGICAL RISKS



CHLORINATED VOCs IN GROUNDWATER

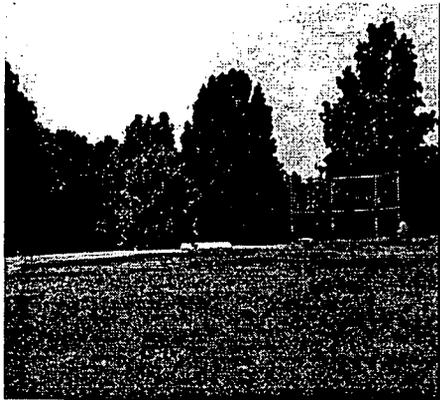


CONCLUSIONS

NINTH STREET LANDFILL IS NOT
THE SOLE CONTRIBUTOR TO THE
PCE FOUND IN GROUNDWATER.

ECOLOGICAL RISKS AND POTENTIAL
REMEDIES SHOULD BE DISCUSSED
WITH THE BTAG.

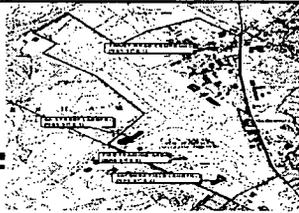
RECOMMENDATIONS



CONVENE MEETING OF
BTAG TO CONSIDER
POND SEDIMENTS

INVESTIGATE (SOURCE)
GROUNDWATER
UPGRADIENT OF SITE

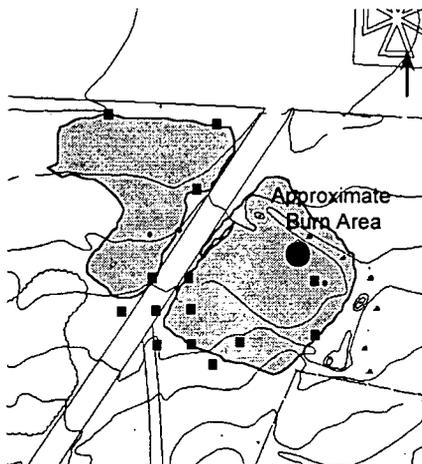
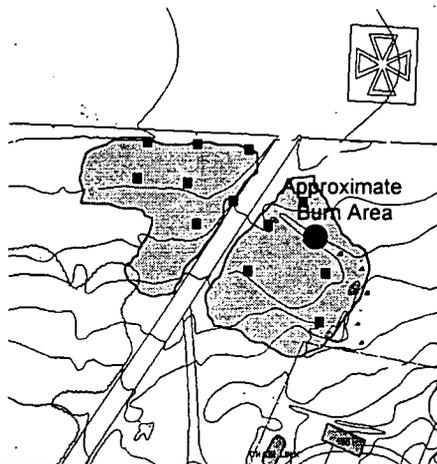
FEASIBILITY STUDY (FS)
FOR GROUNDWATER
PROTECTION



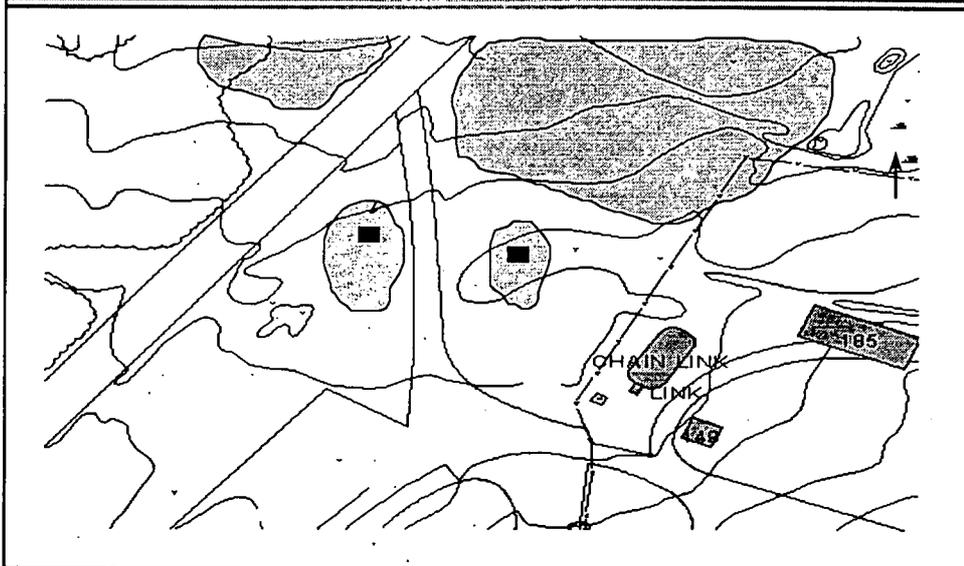
FIRE TRAINING AREA SOIL

Phase I

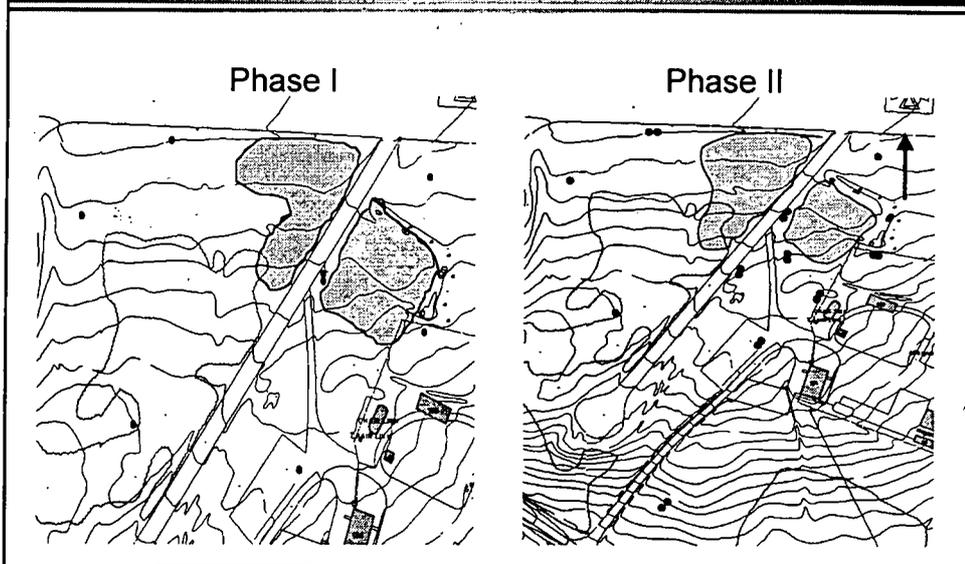
Phase II



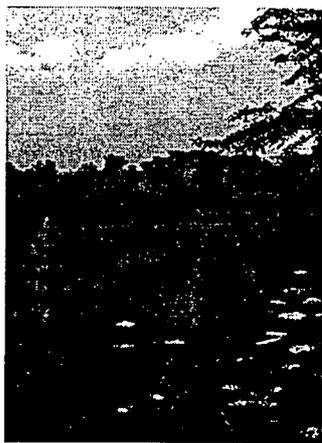
SURFACE WATER AND SEDIMENT



FIRE TRAINING AREA GROUNDWATER SAMPLES



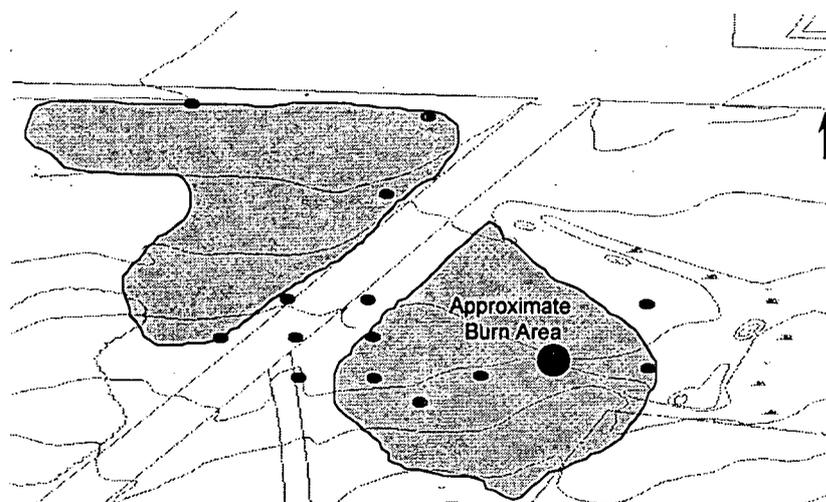
FOCUS AT FIRE TRAINING AREA



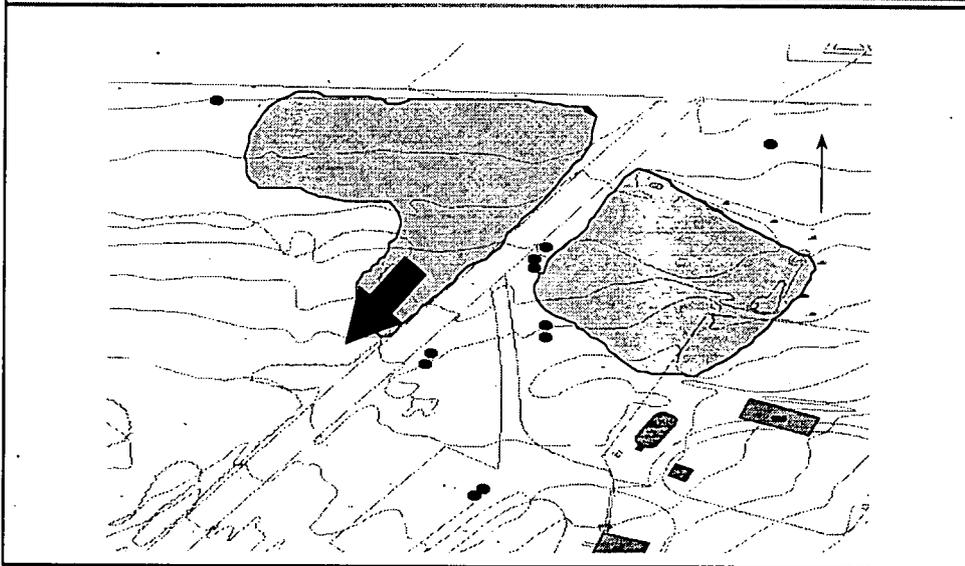
ECOLOGICAL RISKS
FROM SOILS

CHLORINATED VOCs
IN GROUNDWATER

ECOLOGICAL RISKS



CHLORINATED VOCs IN GROUNDWATER

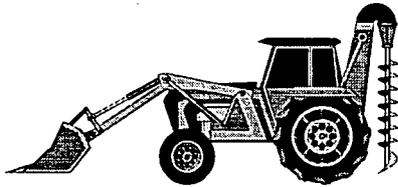


CONCLUSIONS

SURFACE SOILS MAY PRESENT
ECOLOGICAL RISKS TO
RECEPTORS.

CHLORINATED VOC COMPOUNDS
WERE FOUND IN GROUNDWATER AT
LEVELS ABOVE MCLs.

RECOMMENDATIONS FOR FIRE TRAINING AREA



PERFORM FOCUSED
FS FOR REMOVAL
ACTION OF
CONTAMINATED
SOILS

FS FOR
GROUNDWATER
PROTECTION

Primary RAB Responsibilities **for DOD facilities**

- ◆ **Providing advice to the installation on environmental restoration issues.**
- ◆ **Conducting regular, publicly announced meetings that are open to the public.**
- ◆ **Keeping minutes that are available to the public**
- ◆ **Developing and using mailing lists to disseminate information.**
- ◆ **Reviewing, evaluating and commenting on environmental restoration (IR) documents**
- ◆ **Identifying project requirements**
- ◆ **Recommending cleanup priorities among sites or projects**
- ◆ **Identifying applicable standards and proposing cleanup levels that are consistent with reuse**