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NAS JACKSONVILLE
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MINUTES FROM 9 SEPTEMBER 1993 MEETING TO DISCUSS OPERABLE UNIT 3 (OU 3)
STATUS NAS JACKSONVILLE FL
10/6/1993
ABB ENVIRONMENTAL



Meeting-7559
~~1752-8507~~

October 6, 1993

Southern Division
Naval Facilities Engineering Command
ATTN: Mr. Joel Murphy, Code 1853
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: September 9, 1993 Meeting Minutes
NAS Jacksonville Operable Unit 3

Dear Joel:

The following is an account of the joint meeting, which took place on September 9, 1993 with representatives of USEPA; FDEP; SOUTHNAVFACENGCOM; NAS JAX; and ABB-ES, regarding various regulatory issues pertaining to the development of a work plan for Operable Unit 3 at NAS Jacksonville, Jacksonville, Florida. Those specifically in attendance at this meeting were:

- Tim Bahr (Florida DEP);
- Jorge Caspary (Florida DEP);
- Doyle Brittain (USEPA Region 4);
- Joel Murphy (SOUTHNAVFACENGCOM)
- Paul Ina (NAS Jacksonville, NADEP)
- David Driggers (SOUTHNAVFACENGCOM);
- Franco Godoy (ABB-ES);
- Greg Beumel (ABB-ES); and
- Peter Redfern (ABB-ES).

MEETING SUMMARY:

To open the meeting, Joel Murphy presented the Navy's plan for the RI/FS Workplan for OU 3 at NAS Jacksonville. The key items of his presentation were:

- The Navy does not plan to follow the old format for RI/FS, which involved

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extensive study and delayed remediation;

- RDS covered Phase I and part (risk assessment) of Phase II;
- Phase II will cover all of Phase II and part of Phase III;
- Purpose of the OU 3 work plan to be prepared by ABB-ES is to:
 - 1.0 develop data acquisition needs for the performance of the remedial action and remedial design;
 - 2.0 define the problem;
 - 3.0 present the finding from site screening and identify data gaps;
 - 4.0 conduct preliminary risk and remediation screening;
 - 5.0 identify data quality objectives;
 - 6.0 focus the remedial investigation effort;
 - 7.0 undertake a preliminarily feasibility study in identified areas of concern within OU3 to focus the remedial investigation effort; and
 - 8.0 provide a proactive, comprehensive approach for the RI/FS activities at OU 3;
- The workplan for OU 3 is modeled after the objectives of the Super Fund Accelerated Cleanup Model (SACM);
- There will be a preliminary risk screening conducted at OU3 for the purpose of focusing the RI effort. The Navy considers OU 3 an industrial area, however, for risk screening purposes, the Navy will screen against both industrial and residential exposure pathways.
- The risk screen will also include an ecological screen of groundwater contaminant levels vs. Florida surface water standards

Jorge Caspary expressed concern about the data quality necessary to NFRAP a site.

- Joel Murphy responded that Level 3 data would be used for risk assessment and Level 4 only for contentious issues. Level 2 data could be used because it is real time and could be used for risk assessment if there is correlation with the 10% lab confirmation samples.

Tim Bahr asked whether sample collection was adequate to support a NFRAP decision.

- Joel Murphy responded that EPA's guidance allows level one and level two data to be used for screening purposes to evaluate where to collect other samples.
- A minimum of 10% of the samples must be Level 4 data; what percentage level 4 data depends on the correlation between the level 3 and level 4 data.

Doyle Brittain expressed the following concerns:

- Before beginning the RI/FS, the Navy should select the remedies that are possible so that the data needs are determined up front.
- Joel Murphy responded by presenting the Navy's plan to develop a list of presumptive remedies similar to the Air Force list.
- Doyle Brittain agreed that this is the proper approach but would like to see the remedial alternatives discussed in the introduction.

Joel Murphy then presented, the Navy's approach to the RI/FS at OU 3:

1. Data Acquisition
 - plume delineation
 - risk driven
 - solution support
2. Presumptive Remedial Remedies
 - identification of support for presumptive remedies
3. Project Management

Doyle Brittain expressed the following concern about OU 3.

- The Navy should look at the sewer system within OU3 along with available maintenance records to evaluate potential areas where it may have leaks due to settlement and, therefore, plausible sources of contamination.
- In response to Mr. Brittain's concern, Franco Godoy discussed the preliminary results of the current work plan sampling program and stated that contamination is presently found in the groundwater and will no doubt be found at these locations as well.

The discussion continued concerning the petroleum handling system:

- Joel Murphy stated that the Navy would handle releases of petroleum products under the Underground Storage Tank program.
- Doyle Brittain stated that this was acceptable as long as it was handled and not ignored.

Jorge Caspary wanted to know what the RI/FS data acquisition would be, especially if there is no Navy money available for investigations.

- Joel Murphy stated that the RI/FS data acquisition program would be more data gap filling than initial investigation.
- Franco Godoy pointed out that there are three areas of data gaps:
 - 1.0 site characterization;
 - 2.0 risk; and
 - 3.0 engineering.

Jorge Caspary presented the Florida DEP comments on the current scoping field work.

- Florida DEP believes that some of the current borings could be used for additional data collection, which should limit some of the data gaps that need to be filled by the RI/FS; too much of the data acquisition was focused toward obtaining lithological data.
- Franco Godoy pointed out that the lithological data are important.
- Jorge Caspary wanted to get additional contaminant sampling data along with the lithological data.

The discussion turned to the work plan schedule:

- The current scheduled date for delivery of the draft Work Plan is November 17, 1993.
- Laboratory confirmation analyses data from the current sampling program won't be available until the end of October.
- The Navy projects that to include risk screening and presumptive remedies in the work plan will require a three week extension to December 10, 1993.

- To supplement the present sampling program as requested by Florida DEP would require an extension beyond the December 10, 1993 date.
- Jorge Caspary pointed out that Florida DEP did not agree to the Sampling and Analyses Plan (SAP) for the work plan scoping activities before the field work began.
- Both Florida DEP and USEPA agreed they could live with a modest extension of time because the secondary report on sampling may identify data gaps, which will allow the State and USEPA to provide comments.
- The report could be in the form of a technical memorandum that states:
 - 1.0 what was done;
 - 2.0 how it was done;
 - 3.0 what was found;
 - 4.0 the detection limits;
 - 5.0 the correlation between field screening data and the laboratory data; and
 - 6.0 identification of potential data gaps (Joel wants the regulators to comment before the Navy determines the data gaps).

Doyle Brittain pointed out that the March 17, 1993 meeting between the Navy, USEPA, and Florida DEP identified 7 objectives of screening:

1. define the complete list of potential problem areas;
2. provide groundwater flow information;
3. identify preliminary risk objectives;
4. identify geological information stratigraphy;
5. define the ecological environments in the river;
6. conduct a groundwater contamination field survey; and
7. develop a preliminary list of chemicals of concern.

At the same meeting, the Navy agreed that no sites would go to NFRAP based on level 2 data.

USEPA has concerns at Cecil Field about the quality of field lab data and how appropriate is it for risk assessment .

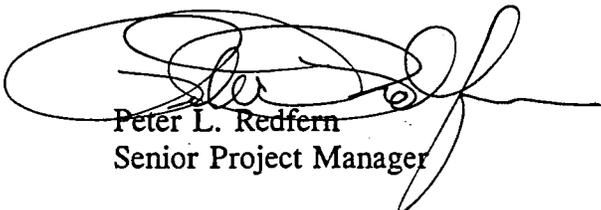
A final schedule was agreed to:

- Complete Supplemental Field Investigation October 10, 1993
- Complete Supplemental Analytical Program November 9, 1993
- Complete Input of Analytical Data November 16, 1993
- Finalize Draft Chapters I & II of the Work Plan December 3, 1993
- Complete Review and Submit Draft Work Plan December 15, 1993
- EPA/FDEP Completes Review of Draft Work Plan, Chapters I & II January 15, 1994
- Review Meeting with SoDiv, EPA & FDEP January 24, 1994¹
- Submit Final Work Plan April 1, 1994

¹Review meeting to occur during the week of January 24, 1994.

If there are any errors or omissions contained herein, please notify us at your earliest convenience.

Very truly yours,
ABB ENVIRONMENTAL SERVICES, INC.


Peter L. Redfern
Senior Project Manager

cc: D. Brittain, USEPA
T. Bahr, FDEP
J. Caspary, FDEP
P. Ina, NAS JAX-NADEP
D. Driggers, SoDiv
F. Godoy, ABB-ES
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