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MINUTES FOR MEETING BETWEEN U S NAVY, U S EPA REGION IV, FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION AND CONTRACTOR ON 30 MARCH  
1987 REGARDING DRAFT FINAL VERIFICATION STUDIES FOR NS MAYPORT FL  
4/9/1987  
U S EPA REGION IV

32228-000

01.01.00.0006

UNITED STATES ENVIRONMENTAL PROTECTION A

DATE: APR 09 1987

SUBJECT: Meeting at Mayport NAS, March 30, 1987

FROM: Herb Miller, Environmental Scientist  
GA/FL Unit, Waste Engineering Section

*Herb Miller*

TO: Mickey Hartnett, Chief  
GA/FL Unit, Waste Engineering Section

*MH 4/4/87*

The purpose of the meeting was to discuss the January 1987 Draft Final Workplan for Mayport's "NACIP CONFIRMATION Study" prepared by E. C. Jordan. The day's agenda, and list of participants are attached. The Navy; the facility; FDER, Jacksonville; FDER, Tallahassee (Superfund); the consultant (E. C. Jordan); and EPA (myself) were represented.

My two primary comments on the plan were:

- (1) Total metals and total pesticides should be added to EP Toxicity for metals and pesticides when soil samples are tested. I explained that under 3004(u), concentration of hazardous constituents must be considered, not just presence or absence of hazardous wastes (in this case EP Toxicity).
- (2) I also recommended that Site 11, the Old Pesticide Site be added to the confirmation study, because that site had been included in the draft HSWA permit. (The Initial Assessment Study (IAS) had recommended that site be dropped from further study.) I said that some soil tests must be done before we can consider "writing off" that site.

At my first comment, the consultants expressed concern about the difficulty of finding background on the base. I did not offer any suggestions; but we did discuss that for organics, background is zero.

During the meeting, I discussed some of the major differences between the NACIP program and the HSWA permit requirements:

- (1) HSWA applies to both inactive and active solid waste management units (SWMUS) while NACIP concentrates only on old abandoned sites.

- (2) HSWA requires addressing releases of hazardous constituents and hazardous wastes, while NACIP concentrates on hazardous wastes or hazardous materials.
- (3) HSWA requires addressing releases to all media, such as air, surface water, subsurface gas while NACIP generally addresses only groundwater and soils.

I also discussed the other SWMUs included in the HSWA permit that were not ever in the NACIP studies. (These are all active sites.)

It was generally agreed that Mayport is unique in that the HSWA permit is about to be issued at nearly the same time that the Navy is getting ready to proceed with a confirmatory study of NACIP sites. It was also agreed that it would be good if the study plan could be modified to meet HSWA requirements. I recommended that Attachment A of the permit be used as a guide. I also recommended the RFA and RFI guidance manuals.

The Navy representative commented that response to the HSWA permit would require a great deal of coordination between the CERCLA (NACIP) and RCRA programs at the Navy. (The RCRA program of the Navy was not present at this meeting.)

Another topic discussed was the Neutralization basin which was recently discovered to be a RCRA impoundment. FDER will require a RCRA closure (permit) since the Navy will not pursue an operating permit. (It is not double-lined.) This is a NACIP site because of an old leak and suspected cadmium contamination. The contractor wondered if this site should be dropped from the study, since its cleanup would be required under the closure permit. I advised against dropping because this unit is subject to 3004(u) (and included in the HSWA permit), and 3004(u) may require corrective action for constituents not required by the closure permit.

The meeting concluded with a tour of NACIP/SWMU sites. At Site 14/SWMU N, I pointed out an area that needed sampling which was not proposed in the NACIP confirmation plan. This site is on NACIP because of an old spill, but it is presently the station's fire training area. The activity I was concerned about is a circular paved bermed area where used oil is burned to simulate a crashed helicopter. Outside this bermed area, the surface is also paved and there is an outer bermed area where the pavement meets the bare ground. The outer paved area is only 5 to 10 feet wide near the helicopter site and there are breaks in the outer berm. During a training exercise, it is very likely that oily water has been splashed across the narrow pavement onto the ground. The contractor also agreed that it appeared that oily runoff had occurred through a break

in the outer berm. The contractor agreed that he could add additional samples at this end of the site if the Navy agreed. (This is a good example of how NACIP only looked at past practices and not ongoing ones.)

Conclusion:

The extent to which the Navy modifies the current NACIP study plan to meet HSWA requirements will probably be a business decision and depend on the degree of coordination between Navy programs within a short timeframe.

Attachment

cc: Doug McCurry, Chief, Waste Engineering Section  
Art Linton, Federal Facilities Coordinator  
Barry Lester, Navy, Southern Command  
~~Jose Negron, Mayport NAS~~  
David Troutman, E. C. Jordan Company  
Michael Fitzsimmons, FDER, NE District  
Eric Nuzie, FDER, Tallahassee

MEMO TO : Barry Lester  
FROM : D. E. Troutman, E.C. Jordan Co. *DET*  
DATE : March 27, 1987  
SUBJECT : Agenda for Meeting of March 30, 1987  
Mayport Naval Station

The following agenda is proposed for our meeting at Mayport NAVSTA on Monday, March 30, 1987. The items included and format concur with plans which we have discussed over the past two weeks.

<u>TIME</u>	<u>ITEM DESCRIPTION</u>
1:00	Introductory Comments and Review of Meeting Agenda
1:15	Review of Project Organization
1:30	Presentation of Work Plan
2:00	Comment and Discussion Period
3:00	Site Walk

MEETING

MARCH 30, 1987

MAYPORT

NACIP

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