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BRAC CLEAN-UP TEAM MEETING 12 SEPTEMBER 1994 NTC ORLAND FL
9/12/1994
BRAC CLEAN-UP TEAM

ABB
ASEA BROWN BOVERI

September 12, 1994

MEMORANDUM

From: Philip Georgariou

To: Wayne Hansel

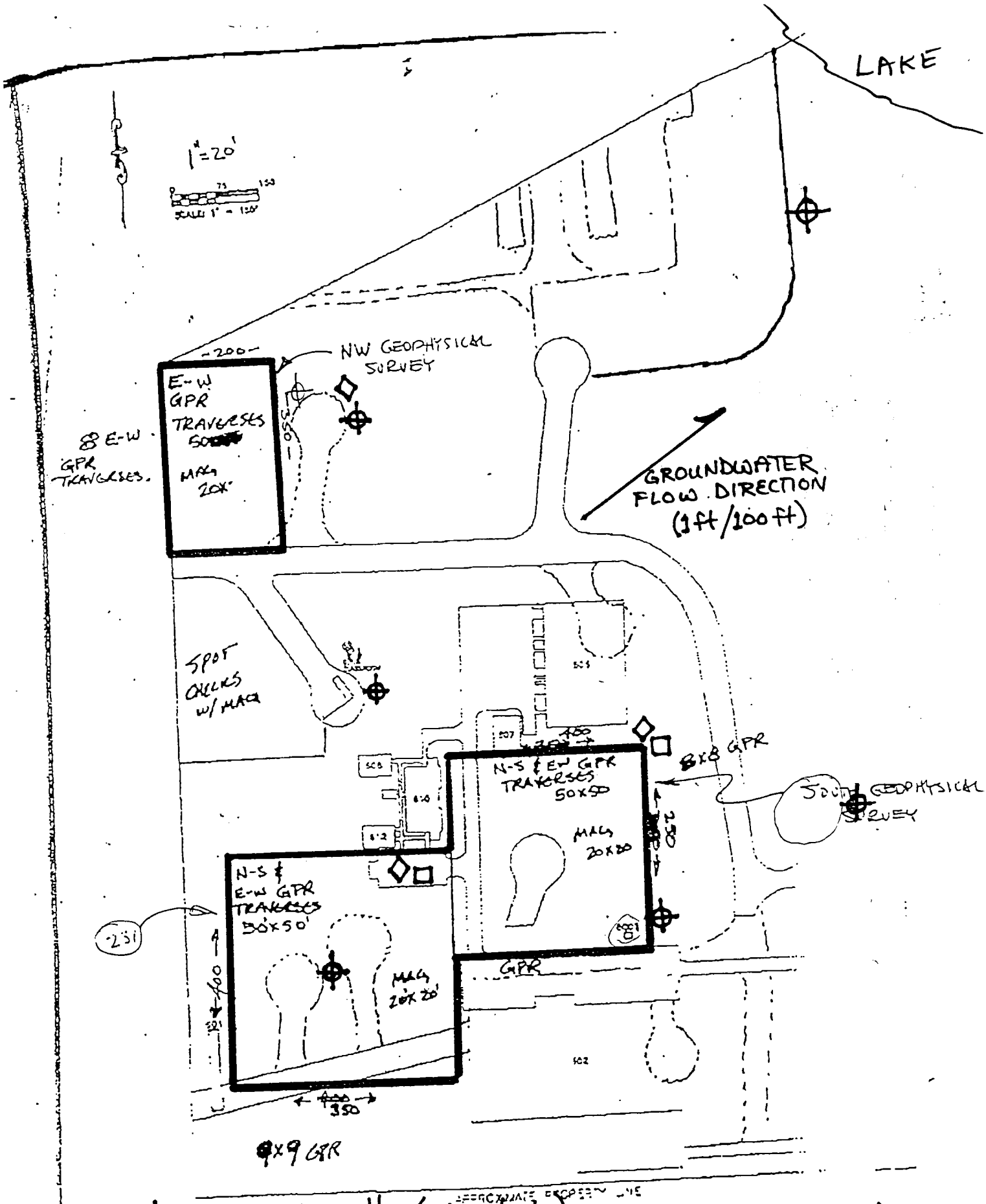
Subject: **Minutes of the September 12/13 NTC, Orlando BRAC Clean-up Team Meeting**

The meeting convened at 10:30 on September 12th in the Public Works office. This followed an informal tour of the Group I Site Screening study areas for Florida DEP personnel. Meeting attendees were:

Wayne Hansel (SouthDiv)
LCDR Catherine Ballinger (NTC, Orlando)
Craig Brown (USEPA Region IV)
David Clowes (FDEP)
Tim Bahr (FDEP)
Philip Georgariou (ABB-ES)
Jim Manning (ABB-ES)

The first order of business was an update on the status of the Group I Site Screening efforts. Philip Georgariou reviewed the results of the geophysical surveys that were conducted. The potential landfill at Herndon was confirmed and a discussion was held relative to what the next steps should be, given that Herndon Annex has such a high transfer/lease priority. The need for additional wells was discussed at some length. With the wells that have just recently been installed, there would still be insufficient information to ascertain whether the former landfill is leaching contaminants to the groundwater. Five additional wells were outlined (see attached depiction) that would be required to definitively write the parcel off as transferrable. If the current and additional wells indicate that no leaching is taking place, the parcel could be transferred with deed restrictions/covenants that highlighted past land-filling practices and cautioned against intrusive work. If the wells indicate that leaching has in fact, taken place, then the area would be referred to additional investigation, such as an RI/FS. The BCT agreed to wait until analytical results from the currently installed, and the additional wells, are received before making plans for any additional work.

LCDR Ballinger briefed the BCT on the plans for the evening's RAB meeting as well as the plans for training the RAB's community members. The second meeting will be a physical tour of the Base and will probably have to be on a weekend; *when* will be up to the community members. The third meeting will be a training session that will combine a presentation from both the State and Federal regulatory members and a follow-on presentation by ABB-ES on the current environmental status of the property. The fourth (and last



◆ = Installed Wells (10'-15' bls)

◇ = PROPOSED DEEP WELLS (TOP OF HAWTHORNE GROUP)

□ = PROPOSED Additional SHALLOW WELLS

scheduled training) session will cover the basics of risk communication.

A review of comments for the Draft EBS Report was then held. (Attendees have copies of the referenced comments.)

EPA Comments

EPA Comment 1: Will be incorporated.

EPA Comment 2: Dates of photos are listed in Appendix C.

EPA Comment 3: There is no record of an aviation gas distribution system. The cited reference applies to natural gas.

EPA Comment 4: An explanation of the tanks (UST/AST) verification will be included.

EPA Comment 5: That information is not available from the data that is currently on the base. Words will be added to explain why no other information was reviewed. All agreed that a records search and review would be useful. Wayne Hansel will task ABB-ES to research the availability of USAF records, prior to initiating pre-transfer EBS efforts.

EPA Comment 6: A map will be added showing all deep wells. The inconsistencies in the description of the Hawthorn Group will be clarified.

EPA Comment 7: The answer is no, a RCRA permit has not been issued for interim hazwaste storage areas. This will be clarified in the text.

EPA Comment 8: See response to Comment 5.

EPA Comment 9: The actual source of the radioactive material is unknown. No further action required on this comment.

EPA Comment 10: Additional information will be added. A reference will be added.

EPA Comment 11: Okay, comment will be incorporated.

EPA Comment 12: Okay, comment will be incorporated.

EPA Comment 13: Specific Building Comments -/

Bldg 103: FDEP indicated that the lead testing of the drinking water needs to be redone for those buildings that previously failed their tests and that the buildings be classified as 6/Red until that time. The facility and USEPA indicated that lead in drinking water does not constitute a release. David Clowes recommended that the facility contact the FDEP District office to get their input. David also felt that previous, improperly-done testing should be redone and that any pertinent information should be included in the EBS Report. These comments apply to all of the buildings that previously failed analysis (lead levels > 15 ppb). All members of the BCT except David felt the building should be categorized as 1/White. No consensus was reached. The Installation has no plans to retest the few buildings that failed prior tests, as these buildings are unoccupied and the results will be meaningless in the future, whenever transfer takes place. FDEP will conduct further research as to notification requirements, vis a vis, lead in drinking water.

Bldg 111: Adjacent properties were categorized with their attendant building. No further action required.

Bldg 229: The EPA's position is that if the bullet lead was left in place, it would constitute a RCRA hazardous waste (D008) site (7/Grey). The Navy will review actions to remove the lead. The building will remain 7/Grey until future use is determined. If the building is going to remain an indoor range, the lead would not have to removed and the categorization would change to 2/Blue (due to storage of other materials). If new owners plan to demolish the building, the categorization would also be changed to 2/Blue and disclosure of the lead content will be required.

Bldg 367: Same comment as Bldg. 103. The lead content action level should be corrected in the EBS Report.

Bldg 500: Comment withdrawn by Craig Brown.

Herndon Annex: Will be changed to 7/Grey.

Bldg 601: Same comment as Bldg. 229.
Bldg 1102: The property will be changed to 7/Grey.
Bldg 2055: The facility will be 7/Grey until the sumps can be investigated.
Bldg 2073: The building will be 2/Blue because of the paint storage locker.
Bldg 2713: This building has not been demolished - the comment can be ignored.
Bldg 7195: The building should be reviewed to ensure that only storage actions took place. if mixing took place, then the classification should probably be 7/Grey. The location should be verified and the description updated.
Bldg 7356: Should be 6/Red due to it's proximity to the landfill.

(Side note: Building 256 should be 2/Blue, in lieu of its current classification of 1/White, because of the Flammable Storage Locker. See FDEP Comment 3 below.)

FDEP Comments

FDEP Comment 1: The necessary repairs have been made. No further action is required.

FDEP Comment 2: All ASTs/USTs will be 7/Grey until assessed, except for Bldg. 109 which just had the USTs replaced, and the former tanks properly closed.

FDEP Comment 3: Buildings that stored hazardous wastes or petroleum products, and that are not already Grey, Red, or Yellow, should be reviewed to see if their use included actions such as mixing or the possibility of spills. If so, their classification should be 7/Grey.

FDEP Comment 4: The real concern that FDEP has is ensuring that future owners/residents are made aware of the actual or potential existence of lead-based paint (friable asbestos will, as a matter of course, be dealt with). Known, or even suspected, existence of LBP has been reported in the EBS checklist, which becomes part of the FOST/FOSL. A follow-up survey, in accordance with current HUD guidelines, of all of the base housing is currently being conducted. Wayne Hansel agreed that the houses should be 7/Grey until the surveys are completed. If no peeling LBP or friable asbestos is found, the property would revert to 1/White. If peeling LBP or friable asbestos is found, the buildings would be 6/Red until abatement/encapsulation procedures are completed.

There appears to be two issues; 1) housing and 2) all other buildings. Housing/residential structures come under HUD guidelines and specific DOD guidance. There are no set guidelines for non-residential properties. FDEP will review their internal guidelines and reopen the discussion at the next BCT meeting. ABB-ES will update the EBS Report to reflect this change, once a decision has been made as to the proper categorization.

FDEP Comment 5: Agreed.

FDEP Comment 6: See the response to Bldg. 103 above. LCDR Ballinger noted that in the Spring, 1994 testing (after the FDEP-cited 1993 failures), the Installation passed the testing.

FDEP Comment 7: The recommended changes will not be made for the EBS Report or the BCP. But a separate poster-size table/chart, with descriptions of Red/Yellow/Grey areas, will be made for future BCT meetings.

FDEP Specific Comment 1: The State and EPA requested to see the documentation for the 3 Dark Green sites. The filling station has been reviewed, but the other two will need to be seen. The documentation will also need to be cited in the EBS Report. If the agencies are not satisfied that sufficient confirmation analysis was conducted, the properties would need to be categorized as 7/Grey until that documentation can be provided.

FDEP Specific Comment 2: Agreed. This effort will be added to the next IR work effort.

FDEP Specific Comment 3: A more readable copy will be appended to these minutes and included in the Final EBS Report.

FDEP Specific Comment 4: All buildings will be reviewed and made 7/Grey if no investigation has been done. If a problem is known, or clean-up/compliance efforts are underway, 5/Yellow or 6/Red will be used as appropriate.

FDEP Specific Comment 5: Disregard this comment.

FDEP Specific Comment 6: The Buildings (229 & 601) will be changed to 7/Grey. See notes for Bldg. 229 above.

FDEP Specific Comment 7: This spill is being investigated under the Phase II (Site Screening) evaluation program. If analysis indicates that sufficient clean-up was conducted (< 1ppm), the categorization will go to 4/Dark Green. Levels of PCBs above 1 ppm will be reviewed for future actions.

FDEP Specific Comment 8: See FDEP Comment 3 above. David will decide which buildings he wants additional information on.

FDEP Specific Comment 9: The explanation in Appendix L will be updated to reflect the lack of written documentation. The color will remain 2/Blue.

FDEP Specific Comment 10: There is no need for an oil-water separator at Bldg. 306. No further action required.

FDEP Specific Comment 11: See Bldg. 1102 above.

FDEP Specific Comment 12: The category will be changed to 6/Red.

FDEP Specific Comment 13: The category will be changed to 6/Red.

NTC, Orlando Comments

Section 2.1 - The comment will incorporated.
Section 2.1.2 - The comment in the EBS Report will be clarified.
Section 3.2.2 - The comment will be incorporated.
Section 3.2.6 - See above comments vis a vis lead in drinking water.
Section 3.2.7 - The revision will be incorporated.
Section 3.2.11 - The cited passages will be clarified.
Section 3.2.13 - The recommended change will be incorporated.
Section 3.2.14.3 - A correction/clarification will be made.
Section 3.2.14.5 - A correction/clarification will be made.
Section 3.2.14.8 - A reference will be provided as to where the information came from.
Table 2-1 will be updated.

SouthDiv Comments

Comment 1: The resulting actions from the Verification Study will be better summarized.
Comment 2: Same response as to Para 2.1.1.2
Comment 3: Will do.
Comment 4: Will do.
Comment 5: See above multiple discussions.
Comment 6: Typo will be corrected.
Comment 7: Will be changed to 7/Grey.
Comment 8: Repairs will be noted in the Summary. Last sentence should cite UST.
Comment 9: The summaries for the surveyed houses will be modified to include a comment that the surveyed house was representative of all houses of that style/model.

Due to the continual changing and adding of sites to the Site Screening program, an updated investigation sysnopsis is provided as an attachment to these minutes.

The conceptual models were reviewed for the two Operable Unit landfills. The purpose of the discussion was to get BCT agreement that the approach being pursued for the RI/FS Work Plan is appropriate. Craig Brown will provide comments within the next week. David Clowes will get his comments back within the next few weeks.

Capt. Smith was not available, so there was no review of the re-use programs.

Barbara Nwokike will establish a Statement of Work (request for proposal) for ABB-ES to perform the following additional tasks:

a) Research, locate, and review USAF records on base activities;
b) Install, and sample, five (5) additional wells around the Herndon Annex Landfill;
c) Provide Technical Memorandum reporting the results of the Herndon Landfill investigation efforts;

d) Survey existing monitoring wells at Building 2080, determine usability, and properly abandon any unservicable wells.

The next meeting will be at 1000 on October 13th and at 0800 on October 14th at NTC, Orlando.

Distribution: Capt. Harry Smith (NTC, Orlando)
LCDR Catherine Ballinger (NTC, Orlando)
David Clowes (FDEP)
Craig Brown (USEPA Region IV)
Barbara Nwokike (SouthDiv)

BUILDING 150
WATER SPORTS FACILITY
6/RED

Building 150 is located at Holland and Nimitz Street in the central part of the Naval Training Center, Main Base, just south of Lake Baldwin. The building is a brick-faced, concrete-block structure with a flat tar-and-gravel roof. It was constructed in 1982 on previously undeveloped property. The building has been used as a general storage and maintenance warehouse for recreational boating and as an outdoor boat storage area since its construction. There is a 500-gallon unleaded gasoline UST for refueling boats and a 500-gallon propane AST for refilling camper and barbecue propane tanks. Both of the tanks are located on the western side of the property.

Environmental concerns including the presence of lead-based paint, radon, and asbestos were investigated during the survey. Due to the age of the building, it is unlikely that it has been painted with lead-based paint. The paint of the building is currently peeling and is in poor condition. No radon testing has been performed to date inside this building. According to the asbestos survey conducted in June 1992, there are no asbestos-containing materials in the building. No recognized environmental impact to or from adjoining properties is likely to have occurred.

Survey techniques employed at this building included a review of available background documentation, an interview with the facility contact, and a visual assessment of the property. Stormwater from the site collects in a retention pond on the northern side of the site. Overflow feeds into Lake Baldwin. There is a transformer on the southern side of the building that contains less than 50 ppm of PCBs. A 2-foot by 2-foot area of staining on the northern end of the concrete pad was noted and this area continued into the surrounding soil. A 1.5-foot by 1.5-foot area on the southern side of the pad also extended into the soil with an additional 9 square feet of stained soil present. The area to the south was associated with a corresponding area of stressed vegetation. The northern part of the property, approximately 2,500 square feet, is considered by the U.S. Fish and Wildlife Service to be a wetland. Based on the information available at the time of the survey, it appears that petroleum products have been released into the soil and further evaluation is recommended; therefore, Building 150 is classified as 6/Red.

NTC, Orlando Installation Restoration Program
Non–UST/AST Investigation Synopsis[1]

As of September 15, 1994

A:\STDYAREA

Site Screening Group I

Study Area	Bldg #	Name	Priority Zone
1	3126	Hospital Civilian BEQ	1
	UNF–12	Alledged Hospital Landfill	1
2	6001	Septic Tank/Leachfield (Herndon)	2
3	73/2817/2818	RTC 1st Lt. Storage	3A
4	250/258	Rusk Memorial Chapel	3A
	251	Rusk Memorial Chapel Annex	3A
5	UNF–13	Septic Tank/Leachfield	3C
6		Lake Baldwin	3D
7		Lake Susannah	3D
8	2134	Greenskeeper Storage	3E
	UNF–15	Former WWTP – Main Base	3E
9	UNF–14	Former Pesticide/Herbicide Storage	3E
10[2]		Former Yard Waste Disposal Area	3E

Site Screening Group II

Study Area	Bldg #	Name	Priority Zone
11	148	Cold Storage Warehouse (Area C)	8
12	1063	DRMO Warehouse (Area C)	8
	1069	DRMO Warehouse (Area C)	8
13	1100 (1101)	Laundry Drycleaners (Area C)	8
14	1102	Disposal Salvage Scrap Building	8

Site Screening Group III

Study Area	Bldg #	Name	Priority Zone
15	7168	Maintenance Yard	6
	7171	Army Motor Transportation	6
	7172	Army Battery Shop	6
16	7178	Training Material Storage	6
	7190	Maintenance Office	6
	7191	Inert Storage Warehouse	6
	7193	General Warehouse	6
	7195	Pest Control Shop	6
17	7182	Housing Office	6
18	7184	Auto Hobby Shop	6
19	7187	Storage	6
20	7203	Maintenance Shop	6
21	UNF–1	Old Golf Course	6
22	UNF–2	Old Football Field	6
23	UNF–4	Northwest Swamp	6
	UNF–5	Southeast Swamp	6
24		Former WWTP – McCoy Annex	6
25	7351	Camp Bath House (RV Park)	7
	7352	Camp Laundry	7
	7357	Family Camp Office	7
	7358	Family Camp	7

Site Screening Group IV

Study Area	Bldg #	Name	Priority Zone
26	111	Visitor's Pass Office	9
27	114	Bowling/Arts & Crafts Center	9
	2010	Security Building	9
	2073	Armory/Hurricane Storage Locker	9
28	127	Grounds Maintenance	9
29	129	Automotive Hobby Shop	9
	131	Paint Shop Materials Storage	9
	2262	Custodial Contractor	9
30	354	Nuclear Power Field "A" School	9
31	358	BEQ/Heating Plant	9
32	2001	Administration Building	9
	2002	NTC Headquarters	9
	2003	DFAS Office	9
	2004	Administration Building	9
33	2024	NTC Supply	9

Site Screening Group V

Study Area	Bldg #	Name	Priority Zone
34	2078	Auto Maintenance Facility	9
	2079	Auto Maintenance Facility Storage	9
35	2121	PW Lumber Storage	9
	2122	PW Shops	9
36	2414	Flammable Haz Waste Storage	9
37	4001	Rec. Services Football Field	9
38	4060	Loading Platform (Bldg. 137)	9
	4067	Loading Platform (Bldg. 137)	9
	15109	Irrigation Well	9
	UNF–10	Open Area (west of Nuclear Power School)	9
39	21022	Softball Field	9
	21023	Softball Field	9
	UNF–6	Bottle Landfill	9
40	UNF–8	Open Area	9
41	2055	Maintenance Shop	9

Operable Units

Study Area	Bldg #	Name	Priority Zone
OU1[3]	21	RTC Fitness Trail	4
	4004	North Grinder (Paved)	4
	4005	North Grinder (Grass))	4
	4021	South Grinder (Paved)	4
	4022	South Grinder (Grass))	4
OU2	7355	McCoy Annex Golf Couse'	7
	7354	Greenskeepers Storage	7
	7353	Golf Course Club House	7
	7356	Lawn Equipment Storage	7

Other Areas

Study Area	Bldg #	Name	Priority Zone
ACM	2713	Picnic Shelter	3A
ACM	2651	Recycling Center	3C
ACM	2045	Vacant – scheduled for demolition	9
		Herndon Annex Landfill[4]	2

[1]Subject to change upon finalization of the EBS Report.
[2]This area is in the southern portion of the Main Base golf course, near the small arms ammunition bunkers.
[3]This area also includes Building 208, the USS Bluejacket. The primary responsibility for this facility, however, lies within the UST program.
[4]Upon installation of additional monitoring wells and analysis of groundwater, a decision will be made regarding additional investigatory requirements at this landfill.