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MICHELLE A. SILKOWSKI

August 2, 1994

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NSWC PANAMA CITY
5090.3a

Commanding Officer
SOUTHNAVFACENGCOM
Attn: Mr. Jim Reed, Code 1856
2155 Eagle Drive
P.O. Box 1900010
North Charleston, SC 29419-9010

**SUBJECT: MEETING MINUTES FOR REFERENCE LOCATION AND RISK ISSUE
CONFERENCE CALL.
COASTAL SYSTEMS STATION (CSS) PANAMA CITY, FLORIDA
CONTRACT TASK ORDER NO. 083
CONTRACT NO. N62467-89-D-0317**

Dear Mr. Reed:

The meeting minutes for the CSS Panama City RFI Reference Location and Risk Issue telephone conference call between SOUTHNAVFACENGCOM, EPA, and ABB-ES held on July 18, 1994, are attached for your review. A copy of the minutes will be sent to EPA Region IV and FDEP upon your concurrence. Please contact either of us at (703) 769-8181 if you have any questions.

Sincerely,



Michelle A. Silkowski
Senior Toxicologist



Steve Watson
Task Order Manager

Attachments

cc: File

ABB Environmental Services Inc.

**MEETING MINUTES FOR THE COSTAL SYSTEMS STATION PANAMA CITY
REFERENCE LOCATION AND RISK ISSUE CONFERENCE CALL
JULY 18, 1994**

Attendees: Jim Reed, SouthDiv
Craig Benedikt, USEPA
Peter Dao, USEPA
Ted Simon, Mantech
Reggie Rogers, USEPA
Steve Watson, ABB-ES
Michelle Silkowski, ABB-ES
Anita Pease, ABB-ES
Joe Daniel, ABB-ES

Meeting Called to Order: 2 pm

Steve Watson (ABB-ES) gave a brief introduction and reviewed the purpose of the meeting and agenda (see Attachment A). All attendees were introduced prior to the meeting. Ms. Silkowski (ABB-ES) initiated discussion on the second agenda item "approach for human health screening of chemical of potential concern for surface water and sediment" with Mr. Simon (Mantech). Minutes from this discussion are below. Ms. Silkowski initiated discussion on the third agenda item "additional issues concerning the human health assessment, dermal exposure to groundwater" to clarify issues remaining after the April 1994 meeting (see Attachment B). Minutes from this discussion are below. Mr. Watson then initiated discussion on the first agenda item "approach for use of background and reference location data collected at Costal Systems Station (CSS) Panama City for surface soils, surface water, and sediments." A summary overview of this discussion is also presented below.

Reference Sample Discussion

Mr. Watson initiated the discussions giving a summary of the reference sample locations as indicated in the Workplan for Phase 2 sampling. He indicated that the Workplan did not identify how the collected samples were to be used in the RCRA Facility Investigation (RFI) and then discussed the approach for our intended use of these samples.

In general terms, Mr. Watson discussed the proposed use of the surface soil background samples and surface water/sediment reference location data in the selection of contaminants of potential concern (CPCs) for the health and environmental assessment being conducted for CSS Panama City. He stated that although organics were detected in the samples collected as reference locations, ABB-ES's approach for the use of the collected background and reference location data is to utilize the inorganics detected in the media specific

background or reference location samples to select chemicals for inclusion in the Health and Environmental Assessment (HEA) being conducted under CERCLA guidelines.

Mr. Watson stated that the reference samples for all media contain organic analytes including PAH compounds and pesticides at low concentrations. Ms. Silkowski noted that the organic analytes that were detected in the reference locations (PAHs) would be expected in an industrialized area such as CSS Panama City and would not necessarily indicate that the inorganic concentrations in those samples were not representative reference concentrations. She also indicated that there is global application of pesticides and the detection of such pesticides was not considered site-related. Mr. Simon agreed.

Ms. Silkowski clarified that the inorganics used in the screening process would follow Region IV guidance. Region IV guidance states that the background/reference screen is a comparison of the maximum detected site concentration to 2 times the average of detects in the background/reference samples. Mr. Simon agreed that this was appropriate.

Mr. Simon and Mr. Rogers (USEPA) agreed that the approach for use of background and reference location samples was acceptable.

Surface Water and Sediment Screening Human Health Approach

Ms. Silkowski stated that ABB-ES intends to use the tap water risk based concentrations in the Region III Contaminants of Concern (COC) Screening Table to screen surface water and the residential soil risk based concentrations to screen sediments. She indicated that ABB-ES sought out the opinion of Mr. Roy Smith (Region III USEPA) as to the appropriateness of this approach and he indicated that it would be an appropriate and conservative use of the table. Mr. Simon agreed that the approach was conservative and acceptable to him.

Mr. Simon clarified that the appropriate Region III risk based concentration table was the March 18, 1994 version using the hazard index of 0.1. Ms. Silkowski confirmed that the March 18th table was being used for CSS Panama City.

Dermal Exposure to Groundwater

Ms. Silkowski stated that based on her recollection of the April 1994 meeting (see Attachment B, page B-4), Mr. Simon had indicated that he would like to see a dermal exposure scenario for groundwater if VOCs or SVOCs concentrations were high. Mr. Simon clarified that it is appropriate to do a dermal exposure scenario if SVOCs are high and that it is a site-by-site consideration. Mr. Simon and Ms. Silkowski agreed that ingestion of groundwater and inhalation of VOCs while showering would be conducted for each solid waste management unit (SWMU) or area of concern (AOC) at CSS Panama City and that dermal exposures would be considered on a site-by-site basis.

Additional Issues

Mr. Simon raised the issue of the depth of soils that FDEP was considering surface soils for CSS Panama City. Ms. Silkowski stated that based on her recollection of the April 1994 meeting (see Attachment B, page B-3), FDEP did state that they would prefer that surface soils be collected at a depth of 0 - 2'. However, Ms. Silkowski further stated that it was also her recollection that FDEP understood that all the sample collection was complete at CSS Panama City and that they would accept 0-1' in this case. Mr. Simon stated that the issue of future sample depth would need to be discussed between USEPA and FDEP because USEPA prefers a depth of 0-1'.

Mr. Simon provided his telephone number to Ms. Silkowski for future reference during the RFI process at CSS Panama City. Mr. Rogers also provided his telephone number to Ms. Pease (ABB-ES).

The meeting was concluded at approximately 2:20 pm.

ATTACHMENT A

**AGENDA
COSTAL SYSTEMS STATION PANAMA CITY**

Monday, July 18, 1994

- Approach for Use of Reference Location Data Collected at CSS Panama City
- Approach for Human Health Screening for Chemicals of Potential Concern for Surface Water and Sediment
- Additional Issues Concerning the Human Health Assessment, Dermal Exposure to Groundwater

ATTACHMENT B

MEETING MINUTES CSS PANAMA CITY RFI RISK SCENARIO TELEPHONE CONFERENCE CALL 22 APRIL 1994 - 2:00 pm

Personnel in Attendance:

<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Mr. Wayne Hansel	SOUTHNAVFACENGCOM	(803) 743-0615
Mr. Peter Doa	USEPA	(404) 347-3016
Mr. Ted Simon	Mantech	(404) 347-1586
Mr. David Clowse	FDEP	(904) 488-3935
Tracey Kauffman	ABB-ES	(703) 769-8166
Michelle Silkowski	ABB-ES	(703) 769-8149
Anita Pease	ABB-ES	(703) 769-8127
Mark Cheyne	ABB-ES	(703) 769-8121

These meeting minutes summarize the April 22, 1994, Coastal Systems Station (CSS) Panama City Health and Environmental Assessment Risk Scenario telephone conference call between the Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), the U.S. Environmental Protection Agency (USEPA), Florida Department of Environmental Protection (FDEP), and ABB-ES. The purpose of this meeting was to discuss the proposed human health and ecological risk assessment exposure scenarios and the proposed data management strategy for the Phase 1 and Phase 2 data. The proposed risk scenarios and data management strategies were summarized and presented to USEPA and FDEP in a memorandum dated April 8, 1994.

Agenda/discussions:

Ms. Kauffman of ABB-ES introduced the participants, identified their respective affiliations, and explained the purpose of the conference call.

Mr. Clowse of FDEP indicated that he had been unable to review the exposure scenarios. Ms. Kauffman requested that he review the memo and submit any additional comments to ABB-ES. Mr. Clowse identified John Mitchell as FDEP's reviewer for the ecological risk assessment and requested that he receive a copy of the exposure scenarios. Ms. Pease stated that Mr. Mitchell would be included in the distribution list and that his comments would be incorporated into the final Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) report.

Mr. Simon, the USEPA subcontractor support for review of the human health risk assessment, stated that he understood the risk scenario memo to be a workplan for the RFI report. Based on his understanding of what should be included in a workplan, he felt the memo was deficient in describing the tasks necessary to complete the RFI. Ms. Silkowski explained that the memo was not a workplan for the RFI report but rather an opportunity for ABB-ES to propose human health and ecological risk assessment scenarios for evaluation in the RFI report. She stated that ABB-ES was trying to achieve a consensus between SOUTHNAVFACENGCOCM, EPA, and FDEP on which scenarios were appropriate for each site to ensure agency buy-in upfront.

Mr. Simon began the discussion by noting that Figure 1 was missing SWMU 8. Ms. Kauffman indicated that SWMU 8 will be shown on the facility-wide figure in the final RFI report. She explained that ABB-ES will not resubmit the memo but rather will incorporate all comments into the final RFI report.

Mr. Simon suggested that we clarify how the physical attractiveness of a site is used in the selection of human health exposure scenarios for current land use (pg. A-1). He also suggested that we list the percentage of land dedicated to industrial efforts (pg. A-5). Ms. Silkowski stated that this will be done in the RFI report.

For the scuba divers scenario, Mr. Simon suggested that only adults be evaluated. Further, he indicated that exposures of less than seven years should be used as subchronic RfDs. Ms. Silkowski agreed and stated that the Naval Diving and Salvage Training Center will be contacted to determine appropriate exposure parameters for individuals currently exposed to Alligator Bayou.

Mr. Simon asked if ABB-ES plans on using the Region III Risk-Based Concentrations to screen the soils data. Ms. Silkowski indicated that the Region III numbers would be used in the human health risk assessment to select contaminants of potential concern. Ms. Silkowski asked Mr. Simon how the Health-Based Cleanup Goals for DOD Sites, submitted by memorandum from Ligia Mora-Applegate of FDEP (February 14, 1994), were to be used for soils in the RFI. Mr. Simon stated that the Clean-Up Goals should be used in the Remedial Goal Options (RGOs) tables that are required by EPA in the RFI for all those contaminants that are present at concentrations that contribute significantly to an unacceptable risk for soils.

Mr. Clowse stated that ABB-ES should not include risk management discussion in the risk assessment. He stated that ABB-ES should consider all possible scenarios for each site listed in Table 1 of the memo. If an exposure scenario is excluded in the RFI, the rationale for exclusion should be clearly stated. Ms. Silkowski asked Mr. Clowse how many years should be considered in selecting future scenarios. Mr. Clowse indicated that 30 years is sufficient.

Mr. Simon asked why no surface soil samples were taken at SWMU 4. Ms. Kauffman explained that SWMU 4 was proposed for no further action (NFA) in the draft RFI Phase 1 report. She indicated that EPA and FDEP requested that additional surface water and sediment samples be collected at SWMU 4 to verify if NFA is appropriate for this site. She also stated that SWMU 4 consists of a gully which has been filled with concrete construction debris, and that surface soils are not present at this site. Mr. Simon suggested that since no data is available for soils or groundwater at SWMU 4, that perhaps soil and groundwater data from SWMU 10 could be used as a surrogate for SWMU 4. Ms. Silkowski agreed that the SWMU 10 data will be evaluated and used as a surrogate at SWMU 4 if the data indicates that it would be appropriate (i.e., similar contaminants from historical use of each SWMU).

Mr. Hansel noted that a future residential scenario must be evaluated in the human health risk assessment unless a deed restriction for land use is obtained. Mr. Clowse agreed with this statement.

Mr. Clowse indicated that EPA and FDEP differ with regard to the definition of a surface soil. EPA requires that surface soils be collected from zero to one foot for direct contact purposes whereas FDEP believes that surface soils should be collected from zero to two feet. FDEP believes that the two foot interval corresponds with the depth of soil a child could be expected to dig and come into contact with. Mr. Simon indicated that he thought that two feet is too deep for a child to dig. Ms. Kauffman explained that ABB-ES collected all surface soil samples from zero to one foot based on EPA and FDEP comments received on the draft workplan. Mr. Clowse indicated that ABB-ES should use the surface soil data collected from the zero to one foot range for the RFI report. It was emphasized that FDEP should make its position on surface soils known once FDEP upper management has made a decision on the range of sample collection. Mr. Simon indicated that Elmer Aiken of Region 4 EPA and Ligia Mora-Applegate of FDEP should discuss the surface soil issue and come to a consensus. Mr. Clowse agreed.

Mr. Clowse asked if ABB-ES received the information on the new Region IV sediment screening values. Ms. Pease indicated that she had received the new sediment screening values and will use them to select ecological contaminants of potential concern in the sediments.

Mr. Clowse suggested that we send a copy of the exposure scenarios to Mr. John Mitchell for review. John Mitchell may have some valuable input for the ecological risk scenarios. Mr. Hansel added that Nancy Morrison may also want to review the memo. She has been involved in the risk assessment for Key West and may want to review the RFI for Panama City.

Mr. Clowse asked if a piezometric groundwater contour map would be included in the RFI report. Ms. Kauffman indicated that it would be included.

Ms. Silkowski pointed out that particulate exposure for soil would not be evaluated in the RFI report for the human health assessment. Mr. Simon agreed that this was appropriate. Mr. Clowse was uncommitted at this time. Ms. Silkowski also indicated that the inhalation exposure pathway for volatiles derived from soils would not be evaluated. Mr. Simon agreed. Mr. Clowse indicated that FDEP would concur as long as sufficient rationale is provided.

Ms. Silkowski asked Mr. Simon his opinion on which exposure pathways need to be addressed for adult exposure to groundwater. Mr. Simon suggested that ingestion of 2 L/day of groundwater should be evaluated for the ingestion scenario. Ms. Silkowski agreed. Mr. Simon further suggested that dermal exposure to groundwater should be considered. He referenced a Dorothy E. Patton memorandum (July 10, 1991) that indicates that exposure to VOCs during showering is equivalent to exposure from ingesting 2 L/day of groundwater. Ms. Silkowski indicated that the dermal exposure pathway would not be pursued for human health based on Region 4 guidance that the Navy CLEAN program has followed in the past, however, ingestion and inhalation of VOCs would be considered. Mr. Simon commented that if high VOCs are present in groundwater, that ingestion and inhalation of VOCs would be appropriate, however, if high SVOCs were present the evaluation of ingestion, inhalation, and dermal scenarios would be expected. Ms. Silkowski disagreed. Ms. Silkowski and Mr. Simon agreed that they would further discuss these issues.

Ms. Kauffman explained the data management strategy for the RFI that was proposed in Attachment B of the memorandum for surface soils, surface water, and sediments. Because surface soil data was not collected during the Phase 1 field investigation, surface soil data from the Phase 2 field investigation will be evaluated for all SWMUs and AOCs. The surface water and sediment samples collected during the Phase 2 investigation were analyzed for the full TCL and TAL scan. In addition, some SW-846 methods were used to obtain lower detection limits for surface water and sediments. Therefore, the Phase 2 data for surface water and sediments will be used in the HEA in the RFI report; the Phase 1 data will be discussed as historical data only.

Mr. Clowse indicated that the groundwater data from both the Phase 1 and Phase 2 field investigations need to be used in the RFI report. Ms. Kauffman stated that ABB-ES's proposed strategy for the use of Phase 1 and Phase 2 data is also summarized in Attachment B. The Phase 1 and Phase 2 subsurface soil and groundwater data will be evaluated on a site by site basis and combined in an appropriate manner. The proposed strategy for integration of the Phase 1 and Phase 2 subsurface soil and groundwater data will be submitted to SOUTHNAVFACENGCOM, EPA, and FDEP once the site-specific evaluation is complete.

Ms. Silkowski solicited opinions on the use of filtered and unfiltered groundwater data. She stated that ABB-ES plans on using the unfiltered data in the risk assessment and the filtered data in the uncertainty section. Mr. Clowse indicated that FDEP will not consider the filtered data in the human health portion of the RFI. He stated that the filtered data could be used

in the uncertainty section but it will not have a large impact on how the groundwater will be evaluated by FDEP. Mr. Simon stated that the RAGS document does not allow the use of filtered data, but that it should be included in an uncertainty section. Mr. Clowse indicated that the RAGS document also provides sampling techniques that minimize the effect of particulates in the groundwater sample. Ms. Pease pointed out that the ecological risk assessment will be evaluating the filtered data for inorganics only. Filtered samples are used for inorganics because these results represent those contaminants in the dissolved fraction which could potentially discharge to surface water and be biologically available to aquatic life.

Mr. Simon indicated that he would be the EPA reviewer for the human health portion of the RFI. Mr. Clowes indicated that he and Ligia Mora-Applegate will act as reviewers for FDEP during the review cycle.

Mr. Hansel asked if there were any additional comments or concerns. There were none and the meeting ended at 3:30 pm.