



TETRA TECH NUS, INC.

1401 Oven Park Drive • Suite 102 • Tallahassee, FL 32312
(850) 385-9899 • FAX (850) 385-9860 • www.tetrattech.com

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21 April, 2000

Commander, Southern Division
Naval Facilities Engineering Command
ATTN: Mr. B.K. Moring (Code 1855)
Remedial Project Manager
2155 Eagle Drive
North Charleston, South Carolina 29406

Reference: Clean Contract No. N62467-94-D0888
Contract Task Order 0038

Subject: Minutes from Remedial Project Managers Meeting
Coastal System Station Panama City, Panama City, Florida

Dear Mr. Moring:

The following is a summary of the meeting minutes for the April 5, 2000 Remedial Project Managers Meeting held at the Coastal Systems Station (CSS) in Panama City, Florida. The purpose of the meeting was to review the current status of several items: the Statement of Basis (SOB), the Corrective Measures Implementation Plan (CMIP) and identify concerns for the individual Areas of Concern (AOC; AOC 1) and Solid Waste Management Units (SWMU; SWMU 3; SWMU 9 and SWMU 10). The personnel present during the meeting included:

Name	Title	Affiliation
BK Moring	Engineer in Charge	Southern Division Naval Facilities Engineering Command
Liz Wilde	Remedial Project Manager	US Environmental Protection Agency
David Grabka	Remedial Project Manager	Florida Department of Environmental Protection
Gerry Walker	Task Order Manager	Tetra Tech NUS, Inc.
Mike Clayton	Environmental Engineer	CSS
Arturo McDonald	Environmental Engineer	CSS

Please review the meeting notes and notify me of any discrepancies.

Introduction

BK Moring began the meeting by indicating the purpose and scope of the meeting. BK wanted to first discuss the SOB and any regulatory comments, then cover the CMIP and any comments on it.

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Statement of Basis

Liz Wilde indicated that she could not approve the SOB as it stands. She stated that natural attenuation is one of the proposed remedies and there is no formal data that natural attenuation is occurring. David indicated that the Technical Memorandum previously completed includes the most recent groundwater data. Liz indicated that even with that data there is no evidence that natural attenuation has occurred, only that a contaminated groundwater plume may have moved into the bay.

The group was then refocused and general statements concerning the SOB were requested.

- Liz Wilde said that EPA could not approve the Statement of Basis as it is presented.
- David Grabka said that FDEP can accept some parts of the SOB but other parts are not acceptable. For instance, at AOC 1, contaminants detected in the monitoring well located closest to the bay exceed surface water standards. Although natural attenuation is proposed for the site some active remedial action is required. In addition, David had concerns with SWMU 10 and its history of Nonaqueous Phase Liquid (NAPL) and the fact that SWMU 2, although closed, had other contaminants detected and therefore may need to be reopened.

The group decided that specific comments on the SOB were needed from FDEP and USEPA. Liz indicated that she would send her comments out as an E-mail message so that the comments would not be classified as "formal" USEPA comments.

Specific discussion of the individual sites followed.

SWMU 3 - Shoreline

Liz Wilde indicated that the Interim Removal Action (IRA) completed on the shore line at the site did not include sediment removal and therefore the IRA was not protective (as stated on page 2 of the SOB).

David Grabka stated that SWMU 3 contains a facility storm-water outfall. He questioned whether contaminants detected in the sediments were a result of the SWMU or the storm-water outfall. David thought that the Facility was going to investigate the storm-water outfall but has seen no data or information on it. Mike indicated that perhaps 25% of the Facilities industrial area storm-water discharges to the outfall. The outfall is included in the Facility's storm-water discharge program, however, only visible checking has occurred and no sampling for laboratory analysis has been completed.

USEPA can not approve natural attenuation as a remedy when it appears that groundwater contaminate plumes have moved into the bay, and not naturally attenuated.

SWMU 3 - Wetland

Both Liz Wilde and David Grabka indicated that the proposed monitoring of wetland sediments was insufficient. The SOB states that if detected concentrations in the sediments increase a remedial action will be implemented. Both David and Liz felt that the statement was too general. They want to see contaminant concentration action levels and a time frame as part of the SOB.

Liz Wilde also stated that because the wetland was constructed by the facility, if an active remedial method was required or if the sediments needed to be removed, it could be done.

Gerry Walker suggested that perhaps monitoring could be conducted at the site with an initial sampling to be used as a baseline. Liz Wilde indicated that the old data could be used as the baseline, however, David Grabka said he would prefer an initial sampling to establish a new baseline.

BK Moring stated that he was concerned that previously approved documents and prior decisions are now being revisited and questioned. Liz Wilde said that regulations change and all decisions are not permanent. She apologized for being new to the team, however she is required to do what she felt is best using her knowledge of the rules and regulations.

BK Moring suggested that we change the focus of the meeting to discuss specific risk numbers affecting the individual sites. David Grabka clarified that FDEP considers two sets of numbers: risk values that are promulgated and are enforceable laws, and values not promulgated that the agency states "need to be considered".

Group stops for break.

SWMU 3 - Groundwater

It was stated that SWMU 3 groundwater may not be a problem because the contaminants of concern were detected in an upgradient monitoring well. Liz Wilde stated that just because it was upgradient of SWMU 3 it can not be disregarded. The contamination is still likely from the facility and all groundwater exceedances must be addressed.

Gerry Walker had concerns about where this meeting was going. He suggested that the group "Brainstorm" the outcome of the meeting and future activities for the group. The brainstorming session identified five items or actions, which were to be completed. The five items/actions were reduced to three items. The two items discarded were "apply different remedies" which was judged to automatically follow and be part of the approval of the SOB and therefore unnecessary, and "implement the CMIP and gather data to support the action" which is not an option until the SOB is approved. The three items/actions that remained and the order of occurrence are as follows:

1. Complete a historic data review meeting (schedule 2 days)
2. Completed additional sampling and analysis and summarize the information in a Technical Memorandum
3. Rewrite the SOB

These actions would all follow receipt of the comments on the SOB from EPA and FDEP. The next meeting for the group would be historic data review meeting following receipt of the SOB comments. At that meeting the group would like a presentation of the historic data based on the comments received and previous decisions.

The group returned to discussing specific data and sites.

SWMU 9

The soils at SWMU 9 are a concern. The proposed remedy of natural attenuation may be appropriate, however, the IRA indicated that blue weathered soils may have been left in the ground.

Liz Wilde was concerned that at Site 98 free-product approximately 6 inches thick was reported in a well designated 300. The group indicated that the 6 inches of product was actually from inside a tank (designated 300) located in a building and not in a monitoring well.

Liz Wilde also indicated the EPA was tasked by Congress to establish "environmental indicators" for ongoing programs. The RCRA program had identified two environmental indicators to determine if progress was being made by the program. The selected indicators are:

- 1) Current human exposures are under control
- 2) Migration of contaminated groundwater is under control

The USEPA Project Managers were then asked to report on different facilities. Liz indicated that CSS Panama City was a yes to "current human exposures are under control", but a no to "migration of contaminated groundwater is under control". Congress will review the baseline list annually and enforcement will occur if EPA does not meet a goal of 75% compliance for both environmental indicator items 1 and 2.

12:00 Group breaks of lunch

13:00 Group resumes meeting

Liz Wilde initiated a discussion of the proposed No Further Action (NFA) for AOC 2. If the NFA letter for AOC 2 states that industrial controls will be implemented, then the LUCAP needs to include the statement and list the AOC and any other sites that proposed the institutional controls.

AOC 1

David Grabka indicated that in October 1999, the decision was made to turn off the bioslurping system at AOC 1. David does not agree with the SOB conclusion that "no source control is necessary only that Natural Attenuation will be required".

Liz Wilde was concerned that she had not recently seen quarterly reports for the site. BK Moring said that the facility was continuing to bail free product from monitoring wells and approximately 1 gallon per week was collected. He also said that he would check on the quarterly report distribution and make sure that EPA received a copy.

David Grabka restated that at AOC 1, he cannot approve natural attenuation of groundwater contamination when there are exceedances of surface water standards in samples from monitoring wells located closest to the bay. BK Moring requested that David be very specific in his comments on the SOB.

Liz Wilde said that she agreed natural attenuation is not appropriate for a plume that is migrating offsite. Natural attenuation is only appropriate for groundwater contaminant plumes that are steady state and located within a site. Liz also suggested that a table be added to the SOB that includes contaminants of concerns, health risk values, and other relevant information.

SWMU 9

David Grabka indicated that he feels the IRA at SWMU 9 addressed all of the soils concerns, however, he still wanted to see an additional deep monitoring well installed in the source area and additional monitoring of groundwater to address the detection of benzene in a sample from a cross-gradient monitoring well.

Liz Wilde agreed that the soils should no longer be a concern following the IRA.

SWMU 10

The group reviewed the available data. The consensus was that the NAPL is no longer present which is progress, however because there is no groundwater data available additional conclusions

are difficult. Either a groundwater plume was present on site and has since migrated into the bay or the plume has hot spot locations that need to be addressed.

Group break

SWMU 2

SWMU 2 may need a LUCIP. Based on previous meeting minutes all of the NFA sites for the RFA are appropriately documented. However, any sites completed since May 1999 will need a LUCIP. David Grabka requested information as to when the RFA was completed or when sites proposed for NFA were included in the RFA. BK Moring reported that it was 1987.

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The group then determined a schedule for the immediate future. The proposed schedule follows.

Schedule

EPA and FDEP comments on SOB	April 26, 2000
Navy Response to Comments to RPM group	3 weeks after receipt of comments (approximately May 17, 2000)
RPM meeting to discuss comments and detailed data	June 6 & 7, 2000

David Grabka requested all data on AOC 1 since the October 1999 meeting. BK Moring and Arturo McDonald said they would forward the data to him and check on the report distribution.

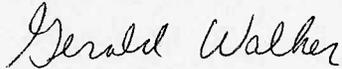
Meeting Closeout

Group discussed changes in regulations and regulatory personnel and the effect of the changes on ongoing environmental programs.

15:25 Meeting concluded.

If you have any questions concerning this summary please call me at (850) 385-9899.

Sincerely,
TETRA TECHNUS, INC.



Gerald Walker, P.G.
Task Order Manager

gw/gw

c: Mike Clayton, CSS Panama City
David Grabka, FDEP
Arturo McDonald, CSS Panama City
Liz Wilde, USEPA