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MEETING MINUTES FROM SCOPING MEETING DATED 30 JULY 1998 WITH TRANSMITTAL
CSS PANAMA CITY FL
7/30/1998
TETRA TECH


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10 August, 1998

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

SITE FILE

Reference: Clean Contract No. N62467-94-D0888

Subject: Minutes from Transition Meeting
 CSS Panama City, Corrective Measures Implementation

Dear Mr. Moring:

The following is a summary of the meeting minutes for the scoping meeting held at the Coastal Systems Station (CSS) in Panama City, Florida conducted on 30 July, 1998. The purpose of the meeting was to review the current status of sites AOC 1, SWMU 3, SWMU 9 and SWMU 10. The personnel present during the meeting included:

| Name | Title | Affiliation |
|---------------------|-----------------------------|------------------------------------|
| Craig Benedict | Remedial Project Manager | US Environmental Protection Agency |
| Wayne Britton | Consulting Scientist | Harding Lawson & Associates |
| Paul Calligan | Task Order Manager | Tetra Tech NUS, Inc. |
| Mike Clayton | Environmental Engineer | Coastal Systems Station (CSS) |
| Don Green | Deputy Public Works Officer | CSS |
| Arturo McDonald | Environmental Engineer | CSS |
| B.K. Moring | Engineer in Charge | SouthDiv NAVFAC |
| LCDR Brant Pickrell | Public Works Officer | CSS |

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

Introduction

Craig Benedict began the meeting by defining the purpose and scope of the meeting. Will discuss the current status of the sites and go over Appendix A of the new RCRA permit for the facility. The new permit will not require a major overhaul, however, it will need to reflect the current status of the interim actions. The statement of Basis will also have to be updated to include the interim actions.

Site Summaries

B.K. Moring provided a status update on the interim actions at the sites.

SWMU 3

A removal action was performed to remove debris (metal parts, concrete, etc.) from the shoreline. Remaining activities include implementation of a long-term monitoring program.

AOC 1

A bioslurping system was installed to recover free product from the surface of the water table. To date, approximately 3,800 gallons of product have been recovered. The system continues to recover approximately 5 gallons of product per day. The recovery rate appears to have stabilized at this rate. The system will continue to operate until the product thickness meets FDEP criteria.

SWMU 9

A work plan has been submitted by Public Works Pensacola for soil removal. The soil removal activities are tentatively scheduled for September, 1998. Soil will be excavated to a depth of 2 feet over the entire affected area. In selected areas which exhibited elevated contaminant concentrations (hot spots) the soil will be excavated to a depth of 6 feet.

SWMU 10

Free product was detected in one well at this location. The interim remedial action involves weekly gauging of the well to monitor the free product thickness. If the free product thickness is 0.1 inch or greater, the free product is pumped from the well. The last time a thickness of 0.1 inch or greater was detected was in March, 1998.

General Discussion

1. A. McDonald asked if AOC 2 should be reopened. AOC 2 is a former above ground bulk storage facility. An investigation is currently being conducted under the UST program to determine the source of product that was detected in the bayou. A. McDonald suggested that if AOC 2 was determined to be the source, the site should be addressed as part of the IR program. C. Benedict indicated that the site should stay in the UST program if the only contaminants detected were petroleum products. If funding under the UST program becomes an issue alternatives will be considered at that time.
2. C. Benedict asked how long the weekly free product monitoring will continue at SWMU 10. B.K. Moring stated that after three consecutive weekly visits where the free product thickness is less than 0.1 inch, the frequency of the visits will be reduced to monthly. Then after three consecutive monthly visits with a thickness of less than 0.1 inch the frequency will be reduced to quarterly.
3. C. Benedict asked what standards will be used at SWMU 3 for evaluating the reduction in contaminant concentrations during the monitoring program. B. K. Moring indicated that the standards will be based on State of Florida criteria.
4. After bioslurping activities are complete at AOC 1, soils and residual groundwater will need to be addressed.

5. C. Benedict asked for a brief summary of the RFI data for SWMU 9. W. Britton indicated that very low levels of contaminants were detected downgradient but they were just above the MCLs. Some high levels of SVOCs were detected in the soils which raised the question of whether free product was present. Subsequent installation of monitoring wells indicated that no free product was present. Recent analytical results indicate that breakdown products are present, suggesting that natural attenuation is occurring.
6. C. Benedict indicated that the State of Florida still has some concerns about SWMU 2. Specifically, they are concerned about the PAH contaminated soil detected at the site. Mr. Benedict suggested that a land use control restricting residential use and allowing continued industrial use would satisfy the States concerns. US EPA policy memorandum dated 21-Apr-98, Assuring Land Use Controls at Federal Facilities, was discussed. The EPA memorandum requires that a detailed Land Use Control Assurance Plan be developed that describes how land use controls are going to be maintained and documented for all of the sites at the facility. In addition, a Land Use Control Implementation Plan is required for each individual site, which describes the particular land use control selected for each site. The EPA policy also specifies that land use control monitoring be implemented. The land use control monitoring will involve an annual drive by to verify that the land use has not changed, and submittal of a report documenting the results of the annual drive by.

EPA has not reached a final decision on how land use control programs will be documented at RCRA facilities. One approach is to generate a Memorandum of Agreement that is signed by the EPA, FDEP and the facility commanding officer. The other approach is to append a document similar to a Memorandum of Agreement to the permit so it falls under the permit and is not a separate document outside of the permit.

Since Land Use Control was selected as the remedy for SWMU 3 a Land Use Control Assurance Plan will already need to be developed for the facility and SWMU 2 will only require the development of an Implementation Plan.

A consensus was reached that this was an acceptable approach for SWMU 2. The Land Use Control remedy will need to be documented in the Statement of Basis.

7. C. Benedict distributed copies of the new RCRA facility permit for review. The following changes to Appendix A were discussed:
 - a) Remove SWMU 2 from Appendix A.2 and add to Appendix A.4 with remedy of Land Use Control.
 - b) Revise Appendix A.4, SWMU 3, remedy for shoreline sediment, to reflect that raking and collecting sediment and debris has been completed.
 - c) Revise Appendix A.4, SWMU 9, remedy for subsurface soil, to indicate that selected contaminated areas of subsurface soil will be removed to a depth of 6 feet.

Once the permit is renewed a new Corrective Action Management Plan will need to be submitted.

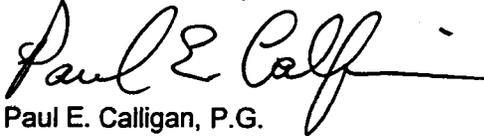
This permit is based on the model permit language. Some minor modifications to this model language were incorporated into the permit issued for Eglin AFB as a result of an appeal settlement. The Work Plan and Report Requirements section was modified to allow a 45 day period for regulatory review of work plans before mobilizing to the field. After 45 days, conditional approval is assumed, however, if any deficiencies are identified by the regulatory agency the facility is still required to address them. The other significant modification was in

the definition and use of guidance in the permit. A list of guidance documents that are used in the corrective action process was added as an appendix. These modifications can be incorporated into the new permit for this facility if desired.

8. The meeting was adjourned and B.K. Moring, C. Benedict, W. Britton and P. Calligan went on a brief tour of the sites.

If you have any questions concerning this summary please call me at (850) 656-5458.

Sincerely,
TETRA TECH NUS, INC.



Paul E. Calligan, P.G.
Task Order Manager

cc: Craig Benedict, US EPA
Wayne Britton, HLA-ES
Mike Clayton, CSS
Don Green, CSS
Arturo McDonald, CSS
LCDR Brant Pickrell, CSS