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24 APR 1987

Mr. Thomas Moody
Special Programs Supervisor
Florida Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, FL 32501-5794

Subj: DRAFT FINAL CONFIRMATION STUDY VERIFICATION STEP FOR THE NAVAL COASTAL SYSTEMS CENTER, PANAMA CITY, FLORIDA

Dear Mr. Moody:

As agreed upon in our joint meeting on March 10, 1987, in Panama City, Florida, the minutes of the meeting are being forwarded. Environmental Science and Engineering, in a separate correspondence dated February 26, 1987, forwarded the Draft Final report.

Should you have any further questions or comments, please contact Ms. Gale Evans at (805) 743-0577 by May 8, 1987.

Sincerely,

GLENN C. BRADLEY, P.E.
Acting Head, Environmental Branch

Encl:
(1) Minutes of Meeting

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Panama City, FL
10:30 a.m.

NAVAL COASTAL SYSTEMS CENTER
PANAMA CITY, FLORIDA
PHASE II-VERIFICATION STUDY DEBRIEFING

Attendees: SOUTHNAVFACENGCOM - Gale Evans
NCSC Panama City - Arturo McDonald
EPA - Region IV - Jim Holdaway
Florida Department of
Environmental Regulation - William Kellenberger
Thomas W. Moody
Jim Crane
Eric Nuzie

ESE - Charles D. Hendry
Julia T. Healy

G. Evans opened by stating the purpose of this meeting was to discuss the findings of the Verification Study field work and Environmental Science and Engineering's recommendations. C. Hendry then passed out summary packets which included site maps, analytical results, and recommendations.

J. Healy discussed each of the former disposal sites and the hydrology at the installation. Then C. Hendry discussed analytical results, recommendations for site closures, and recommendations for Phase II Characterization Study. J. Holdaway asked whether or not there was any significance to the fact that petroleum products were not found in the ground water at Site 1 but were found in the sediments at Alligator Bayou. C. Hendry noted that this was probably due to sediment transport from Site 4 where petroleum products are known to be seeping through the bulkhead rather than contaminant migration from Site 1.

T. Moody asked for the definition of site closure. Does it consist essentially of ground water monitoring rather than physical closure of the site? C. Hendry replied that site closure mainly consists of ground water monitoring. All of the sites have been closed for a number of years and disposal activities no longer occur.

J. Holdaway asked why residual fuels were found at the fire training area while at other sites that I have been involved with, no residual fuels were found. C. Hendry noted that the presence of residual fuels at fire training areas depends upon the degree to which the sites were used (i.e. volumes of petroleum products combusted), the duration of their use, and the site geology.

J. Holdaway asked if we were confident that the monitor wells recommended for Phase II Characterization are located sufficiently to detect contaminants present at those sites. C. Hendry said the Characterization Study monitor well locations have been recommended on the basis of our studies. Final locations will be determined by the A&E contractor who

performs the Phase II Characterization Study based upon the information we provide and their assessment of each site. Agency comments will be requested prior to the initiation of the Characterization Study. J. Holdaway also asked if the upgradient monitor wells installed at NCSC were really located in upgradient areas. C. Hendry replied that background wells were located on the basis of topography. Ground water contours repaired from water levels measured in the 20 monitor wells indicated that ground water levels generally corresponded to topography. Several of the background monitor wells did contain contaminants and this may be due to contaminant transport from other sites or gradient reversals due to tidal effects.

J. Holdaway questioned whether or not any of the sites are an imminent health hazard. C. Hendry said no site presents an imminent health hazard. A Floridian well located in the residential area of NCSC was used as a drilling water source (unchlorinated) and was sampled and no contaminants were found. If the deep wells which are maintained for emergency use were connected for drinking water use then a potential health hazard could occur because some of the deep wells on the installation are located beneath contaminated areas.

A. McDonald commented that the worst problem at NCSC is oil seepage into the bayou. Site 4 is crucial in terms of remedial action. C. Hendry replied that remedial action normally used at this type of site is essentially a ground water barrier is constructed to intercept and collect ground water. For example, a collection trench and a thief sampler could be used to collect floating product for treatment. Dissolved projects are removed by air stripping and/or activated carbon columns.

J. Crane questioned whether Site 4 the only site where PAHs were analyzed, and if so, why were the other sites with diesel contaminants not sampled for PAHs? He had recommended sampling for PAHs at sites 1, 2, 3, and 6. Why was this recommendation not incorporated in the work plan? Analysis for PAHs can be incorporated into the subsequent monitoring programs. Please incorporate the recommendation for PAH analysis at these sites into the written comments.

J. Holdaway said he had received some recommendations with regard to the SWMU/RCRA closure requirements. According to EPA headquarters, sites with no evidence of contamination are not required, by law, to submit a formal closure, plan for a solid waste management unit (SWMU) site.

T. Moody suggested that a clay cap be put on Site 6 as part of the closure for that site to prevent continued erosion.

J. Holdaway said that regarding SARA, the regional EPA offices will be ranking sites based on information obtained from reports, like this one, for NCSC. EPA has not yet determined whether sites would be ranked as a facility of by individual sites. Further, ranking as a site under SARA will not necessarily cause a site to be handled under SARA.

A. McDonald asked, "What happens when a site falls under CERCLA?" J. Holdaway answered that if a site falls under CERCLA then a closure plan is required. Otherwise, if a site shows no signs of contamination then the site is apparently not required to prepare a closure plan under RCRA.

J. Holdaway summarized by saying that the Verification Study results and recommendations were good.

G. Evans said that all comments should be directed to SOUTHNAVFACENGCOM as soon as possible after receiving minutes, work plans, or studies.

T. Moody said only one copy of the final report should be sent to the Pensacola DER office.

G. Evans closed by thanking everyone for attending.