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**HINUTES OF THE THIRD TECHNICAL  
REVIEW COHHITTEE MEETING  
NAVAL AIR STATION PENSACOLA  
PENSACOLA, FLORIDA  
HARCE 21, 1990**

**April 1990**

**Prepared for:**

**DEPARTMENT OF THE NAVY  
SOUTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
2155 EAGLE DRIVE, P.O. BOX 10068  
CHARLESTON, SOUTH CAROLINA 29411-0068  
Contract Number N62467-88-C-0200**



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International Specialists in the Environment

The meeting was held at the Naval Air Station (NAS) Pensacola in Building 1754 and commenced at 0900 hours. Captain Jupin began by stating that the meeting was being documented by tape recording and not by stenography, and that the meeting minutes would be distributed later. He also said that the minutes are going to be placed in a repository for future reference. Captain Jupin asked that everyone introduce themselves, and state who they are and what they do.

The attendees of the meeting were:

Ron Joyner	- Installation Restoration Engineer, NAS Pensacola
DeWayne Ray	- Environmental Engineer, NAS Pensacola
John Barksdale	- Ecology and Environment, Inc. (E & E), Pensacola
Nancy Dean	- EPA Region IV, Atlanta
Captain Riley	- Commanding Officer NADEP
Captain Jupin	- Commanding Officer NAS Pensacola
Commander Baner	- Executive Officer Public Works Center Pensacola
Jerry Coling	- Dept. of Earth Science, University of West Florida
Eric Nuzie	- Florida Department of Environmental Regulation (FDER), Tallahassee
David Criswell	- U.S. Navy Southern Division, Charleston
F.R. Fritz	- Facilities Management Director, NAS Pensacola
Rick Rudy	- E & E, Tallahassee
Jim Crane	- FDER, Tallahassee
Harry White	- NAS Pensacola Public Affairs
J.B. McKamey	- NAS Pensacola Public Affairs
Frank Stuart	- Environmental Engineer NADEP
<b>Hark Lewis</b>	- <b>Judge Advocate Public Works Center, Pensacola</b>

Captain Jupin continued by stating that the purpose of the meeting was to discuss the Technical Review Committee's (TRC's) comments on the administrative documents for the investigation. Captain Jupin introduced David Criswell, who, he said, would present a brief background summary on the documents and the comments received.

Hr. Criswell said that the documents were submitted to the EPA in May 1989, and were submitted to the TRC sometime after that. Final comments on Ecological Risk Assessments were received from EPA in December, and at that time the contractor was tasked with responding to all the comments. The contractor furnished these responses in February, and NAS Pensacola sent the responses out to the TRC members shortly thereafter. He said if there were any concerns regarding the responses, they should be brought up during this meeting. He then introduced John Barksdale.

Mr. Barksdale began by discussing the overall approach to be used during the site investigations. Phase I is the field screening phase which consists of a general site reconnaissance, geophysical surveys, soil and water sampling, and an analytical screening method. The purpose of Phase I is to identify principal areas and primary contaminants of concern at each site. Phase II is the characterization phase and is highly dependent upon the results of Phase I. This phase involves performing soil, water and air sampling, and conducting full spectrum laboratory analyses to characterize and quantify contaminants in the principal areas of concern as determined during Phase I. Sites that are found to be clean will then be eliminated from the program. Phase III will be conducted on the remaining sites which need further delineation, and will consist of defining the extent of contamination by performing a full spectrum laboratory analysis of soil, water, air, and biota samples. This will enable the delineation of the horizontal and vertical extent of the contamination and provide the data base necessary to support an evaluation of remedial alternatives. Mr. Barksdale stated that a decision has been made to move the biota sampling to Phase II rather than in Phase III, as originally planned.

Captain Jupin commented that for any who requested the information, Mr. Barksdale would provide them with copies of the overhead sheets. Mr. Barksdale agreed. Captain Jupin then requested that Mr. Barksdale define biota sampling. Mr. Barksdale responded that biota sampling was the procedure of taking living creatures such as clams, worms, fish, etc., and testing them to determine if they are contaminated or are being affected by the toxic compounds that are present .

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Mr. Barksdale continued with his presentation saying that the advantages of the phased approach are that it allows efficient identification of contaminated sites and early elimination of non-contaminated sites. It also allows for a focused placement of sampling locations and early analytical parameter selection for later phases of work. The phased approach results in overall efficiency and cost-effectiveness, as well as fully supporting the evaluation of clean-up alternatives.

Mr. Barksdale went on to present the major issues of concern regarding the TRC comments. Captain Jupin commented that if TRC members had any additional concern or issues which he felt needed to be addressed to please do so during this presentation. Mr. Barksdale agreed and added that this presentation did not include all of the comments but just a few that were selected for discussion.

Mr. Barksdale continued the presentation by discussing the comments from the Commanding Officer of NADEP. Mr. Barksdale said that he would coordinate with **NAS** prior to fieldwork to prevent any obstruction to buildings or structures. Captain Riley stated that there was only one site that they were really concerned with. Frank Stuart stated that it was Site 11. Captain Riley continued saying that Site 11 was the main concern though there may be others to consider. Mr. Barksdale agreed and stated that another concern was that the wells located on aircraft ramps and tow-aways must withstand aircraft weight. Mr. Barksdale said that the well covers would conform with the weight requirements. Captain Jupin also commented that the covers should also be restrained **so** as to not interfere with normal operations of aircraft.

Mr. Barksdale then addressed the comments from the Escambia County Emergency Management Office (EMO). Mr. Barksdale responded to the concern of emergency notification by stating that the hospital would receive prior notification of the arrival of any contaminated victims. In addition, the **NAS** Fire Department would be notified of any emergency and cellular phones would be used to maintain communications during fieldwork. The EMO would be notified of any emergencies affecting waterways or other areas in Escambia County.

Mr. Barksdale then responded to the comments from FDER. Mr. Barksdale said that deeper wells would be installed to be able to detect "sinker" solvents as deemed necessary. Captain Jupin requested a definition of shallow and deep wells. Mr. Barksdale responded that shallow wells go just into the water table, whereas deeper wells could go beyond that by 30 to 40 feet. Rick Rudy stated that the estimate was very site specific. Mr. Barksdale agreed. Mr. Barksdale also stated that all the existing wells would be resampled during Phase I. Captain Jupin asked if that referred to all of the wells on the base or just at Site 30. Mr. Barksdale responded that he was referring to the existing wells at all the sites. Another concern was addressed, as Mr. Barksdale continued, of including some additional analytical parameters for specific sites. Mr. Barksdale stated that the additional parameters would be site-specific and would be added where possible.

Mr. Barksdale then responded to selected comments from the EPA Region IV. Mr. Barksdale said that the concern that human-disturbed stratigraphy would affect the electromagnetic (EM) surveys was not a major problem and would actually provide information on the locations of previous landfilled areas. He said that all factors would be considered when analyzing the EM data. Another concern was the organic vapor analyzer (OVA) headspace method. Mr. Barksdale responded that this method is proven to be reliable for delineating soil contaminated with volatile organic compounds and conforms to FAC 17-770 for petroleum contamination sites. The method is also very cost-effective. Mark Lewis asked if there was an alternative method. Nancy Dean responded that she was speaking with some people now regarding an alternative method. Captain Jupin stated that the EPA claims the OVA method invalid, whereas E & E is stating that it is in accordance with the codes. Ms. Dean replied that it is used in Florida but that does not necessarily mean that the EPA will approve its use. Mr. Lewis restated that the Navy believes the OVA method **to** be a valid way **of** screening. Captain Jupin stated that this aspect was still open to discussion. Mr. Criswell responded that this and others are still open to discussion. Mr. Barksdale agreed and said that further discussion would be made toward resolution. Mr. Rudy commented that E & E has suggested this particular method because it is used **so** extensively in Florida and because it is **so** cost-

efficient. Any alternative method that the EPA suggests would probably be much more expensive. He also made the point that this procedure was being used for screening purposes and not for the clean-up effort. Captain Jupin acknowledged.

Mr. Barksdale continued saying that Appendix IX sampling for Solid Waste Management Units would include at least one sample per media at the RCRA sites and would be analyzed during Phase 11. Another concern addressed was a suggestion that there be separate operable units to handle any contamination in 1) Pensacola Bay, 2) Bayou Grande, and 3) freshwater wetlands. His response to this was that until it is known which sites are contaminated and what areas are affected it is premature to create these units. Mr. Barksdale said that the Ecological Risk Assessments could be conducted after Phase I and when there is reasonable evidence to suggest that the sites contributed to surface water body and wetlands contamination. Another concern of EPA was that four phases of investigation are too many. Mr. Barksdale responded by saying that the phased approach is valid and allows early elimination of non-contaminated sites and full investigation of sites determined to be contaminated. Mr. Barksdale also stated that EPA's concerns regarding using PVC as opposed to stainless steel for well construction appears to be unjustified at the majority of the sites. The Navy is researching the issue to determine if solvents present at certain sites may warrant the use of stainless steel instead of PVC. EPA's concern is that the solvents may affect the analytical results. Frank Stuart inquired of the cost difference between PVC versus stainless steel. Mr. Barksdale responded that estimates using an average site for the Navy would incur additional costs ranging from \$200,000 to \$500,000. Mr. Lewis asked if that were on a forty foot well. Mr. Barksdale said that the price quoted was for all of the wells at all of the sites. Mr. Lewis asked if solvents would be present at all of the sites. Mr. Barksdale responded no. Mr. Lewis also asked if all of the sites would be affected or **just** some of them. Ms. Dean responded that the **work** plan would have to show some kind of justification for using each material at each site. Mr. Lewis rejoined that essentially what the EPA is wanting is stainless steel being used where solvents are present and that PVC could be used in most other cases. Ms. Dean responded that there have been cases where PVC had been allowed even when solvents were present where the aquifer is saline. Ms. Dean said that the main point the EPA is stressing is the quality of data and that is why they

require **so** many details in their quality assurance project plan. Mr. Criswell added that the Navy is in the process of gathering data to justify their position one way or the other to the EPA. Mr. Lewis asked if this justification was being done on a policy level by the Navy and the EPA or left for them to decide. Mr. Criswell said at this point that it was between the **EPA** and Southern Division. Mr. Lewis acknowledged. Mr. Criswell went on to say that the policy varies between **EPA** regions. Mr. Rudy stated that **E & E** has state superfund work and that the state does not require them to use stainless steel. Mr. Criswell added that much research has been done and preference is split **50-50 so** no determination has yet been made. Mr. Rudy asked Mr. Barksdale how much the difference is per foot between stainless steel and PVC. Mr. Barksdale answered that PVC costs about \$3.00 per linear foot and stainless steel costs about **\$25.00** per linear foot which results in approximately a **\$20.00** per foot increase for stainless over PVC. Captain Jupin asked what do they currently have now. Mr. Barksdale and Mr. Criswell answered PVC. Mr. Criswell continued saying that PVC was installed for the most part and that those wells were put down as RCRA wells in accordance with state guidelines.

Mr. Barksdale continued his presentation stating that if justified (based on Phase I results) a biological sampling plan would be prepared with the Phase II work plan for Bayou Grande plus the ponds at Site 30. He also stated that biological toxicity tests and benthic organism biotic indexing would be performed based also on Phase I results. It was decided, however, that this sampling would be moved to occur after Phase I. In addition, five sediment sampling locations north **of** Site 30 in Bayou Grande would be added for analysis of chemical contamination only. The need for and/or locations of the biological sampling would be determined based on the chemical analyses conducted during Phase I. This concluded his presentation.

Mr. Stuart asked if there was any way that the Navy could expect the various sections **of** the EPA to consolidate their comments. Mr. Lewis responded that once the **FFA** is in place that it should resolve most of the diversification. ~~Ms.~~ Dean stated that the comments from the two different sections should be combined ultimately but that there will always be a break-down **of** comments by section for a more thorough explanation of each position.

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Mr. Criswell stated that the schedule for draft final work plan has not yet been resolved. Most aspects of the plan have been resolved with the exception of quality assurance which should be resolved within the next few weeks with the EPA. Once resolution has been made on those issues the Navy will then generate draft final work plans within 30 days. Within the next 60 days the draft final work plans should be sent out to the TRC. Mr. Criswell said that the PVC/stainless steel issue will not be as easily resolved and may take longer but it should not affect Phase I. Captain Jupin asked if by the first of July the individual agencies should receive the draft final work plan. Mr. Criswell answered yes. Captain Jupin also asked if the work plans would be returned to Southern Division with comments within 30 days. Mr. Criswell responded yes and hopefully with minimal comments if any. Captain Jupin inquired if the TRC should receive them back by the first of August for finalization of the draft work plan. Mr. Criswell commented if they were going by the Federal Facilities Agreement, which has not yet been signed, the DER agencies would have 30 days to either approve the document or invoke dispute resolution. If they did nothing then the work plans would become final. Captain Jupin asked when the TRC would get together to review the draft final work plans. Mr. Criswell replied probably July or August and the meeting could be scheduled with the beginning of field work. Jim Crane asked if there is a way the final documents could show the changes made. Mr. Criswell responded yes. Captain Jupin also responded that a black line in the margin showing a revised section is easier than bolding or highlighting. Mr. Crane agreed. Mr. Criswell restated that the next TRC meeting will be in late July or early August. Captain Jupin asked ~~Ms~~ Dean if she would have any problems proceeding with Phase I. Ms. Dean responded that they have no problem with the stainless steel temporary wells only with using PVC as permanent wells. Captain Jupin asked if the EPA was adamant about using stainless steel where solvents are present, and if the EPA was open to discussion where no solvents are present or where the aquifer is saline. Ms. Dean said yes.

Mr. Criswell stated that they would like to begin field work in late July or early August. Since it takes 60 to 80 days to mobilize the contractor they will begin the process now of getting the statement of work out as well as getting funding together. Mr. Criswell said that at the next TRC meeting he will have a definite time-line of events for the field-work.

Mr. Criswell continued saying that the Federal Facilities Agreement (FFA) between the EPA, the State of Florida and the Navy coordinates the work being done under the facility permit. The FFA also establishes schedules for submittal of reports, documents, etc. An annual schedule will be submitted as to what documents will be submitted to the EPA ~~and Mark Lewis will be the~~ <sup>\*</sup> ~~negotiator~~. At this time all negotiations with the EPA and the State of Florida have been completed. After the FFA has been approved by each agency and returned to them it will then be sent for approval to the Assistant Secretary of the Navy. Captain Jupin asked if they have to wait for Jacksonville and Cecil Field's concurrence before sending the FFA up the chain. Mr. Lewis answered that the draft agreement had already been sent and no significant problems have been found. Cecil Field has already endorsed the draft agreement. Jacksonville may be sending any comments that they have. Mr. Criswell asked if Mr. Lewis knew the nature of the Jacksonville comments. Mr. Lewis responded that they were concerned with the circle of integration because of past dealings with the EPA. Captain Jupin asked if they would have the agreement by July or August. Mr. Lewis answered that they should have it fairly quickly after all of the endorsements are made. Endorsements have been made by Cecil Field but he has not heard from Jacksonville.

Mr. Criswell stated that he is assuming that the Navy's responses to the TRC comments are acceptable with the exception of the QA issues. If **so** then the responses will be finalized. Captain Jupin asked that the representatives of those areas please state their agreement or disagreement. Captain Riley agreed. Mr. Nuzie agreed. Ms. Dean stated that written responses were not satisfactory but that the changes discussed yesterday were agreeable. Captain Jupin asked if the only issues still unresolved were PVC versus stainless steel and some of the Quality Assurance portions of the program plan. Ms. Dean replied affirmatively and added that they also wanted a more detailed schedule, a biological sampling plan, and a separate work plan for those three bodies of water.

Captain Jupin asked if they would have to reconvene the TRC. Mr. Criswell responded that the TRC would reconvene after Phase I. Captain Jupin asked if that would satisfy Region IV. Ms. Dean responded that the verbal responses do. Mr. Criswell stated that the TRC meeting would be scheduled after Phase I. Captain Jupin asked if there was any need to do **so** before that time. Mr.

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Criswell replied probably not, and that only minor details remained. However, in order to keep Region IV informed a technical memo could be sent. Captain Jupin commented that he felt that it would be appropriate for everyone to receive a memo regarding resolution made with the EPA. Then we will reconvene in July or August for the final work plans and for the ground-breaking ceremony. Mr. Criswell mentioned that any public members who wished to attend the project managers meetings could do so if they wished. Captain Jupin asked if technical notes were sent out. Mr. Criswell responded that they could be. Captain Jupin suggested that technical notes should be sent to those public members who are not represented in the project managers meetings. Mr. Criswell agreed. Mr. Barksdale asked if notification of those meetings could be sent also. Mr. Criswell agreed. Captain Jupin inquired if that was all that needed to be discussed. Mr. Criswell responded yes. Captain Jupin said that the first of April is when they plan to have the public briefings provided to the Pensacola City Council and Mayor, and the Escambia County Commissioners. After the meetings are completed then the public hearings will commence at the various agencies. Captain Jupin stated that the next time that the TRC will formally meet is late July or early August to review the draft final work plans and the precon for the ground breaking. Also, the repository will have minutes of all the various public meetings which will be held beginning April. Captain Jupin asked if there was any other business new or old. There was no response. Captain Jupin motioned that they adjourn.

The meeting adjourned at 1000 hours.

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