MINUTES OF THE PROJECT MANAGERS MEETING NAVAL AIR STATION PENSACOLA PENSACOLA, FLORIDA JANUARY 29,1991

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The meeting was held on January 29, 1991, in Building 1754 at the Naval Air Station (NAS) Pensacola, Florida and commenced at 11:10 am. The attendees of the meeting were:

David Criswell	-	U.S. Navy Southern Division, Charleston;
Ted Campbell	-	U.S. Navy Southern Division, Charleston;
Ron Joyner	-	NAS Pensacola;
Bill Kellenberger	-	Florida Department of Environmental Regulation (FDER), Pensacola;
Tom Moody	-	FDER, Pensacola;
Eric Nuzie	-	FDER, Tallahassee;
Jim Crane	-	FDER, Tallahassee;
Jack Wilcox	-	Ecology and Environment, Inc. (E & E), Buffalo; and
John Barksdale	-	E & E, Pensacola.

David Criswell asked i everyone was ready to begin and stated that this was a preliminary meeting to the actual TRC meeting to discuss specific technical issues. D. Criswell began with a synopsis of the Phase I site work. He stated that work had begun on ten of the original 37 sites and was on schedule. He also said that a contract modification is underway to implement Phase I work for the next group of sites. This work should be awarded in March and should begin in April. At this time, information is coming in on the first group of sites. A problem with the analytical screening detection limits had come up during the work currently being performed, and the letter sent to the FDER contained some errors. The main discrepancy is that the letter stated milligrams per liter or milligrams per kilogram and it should have stated micrograms.

John Barksdale agreed.

D. Criswell stated that J. Barksdale would now expand on the actual detection limit changes.

J. Barksdale began with several tables to illustrate what the changes would affect. He explained that the detection limits originally listed in the Generic Quality Assurance Project plan (GQAPP) were estimates since the actual methods had not been developed yet. The methods have now been fully developed and tested, however, some of the detection limits and reporting formats are changed. These changes are: 1) phenols will be reported as trichlorophenol instead of pentachlorophenol, and the detection limit for soils will be 2,000 µg/kg instead of 1,000 µg/kg; 2) dieldrin and 4,4'-DDE will be reported together as dieldrin/4,4'-DDE instead of separately with no changes to the detection limits; 3) the detection limit for PCBs in soils will be 5,000 µg/kg instead of 1,000 µg/kg; and 4) the detection limits for arsenic in water and soils will be 70 µg/L and 7 mg/kg, respectively, instead of 60 µg/L and 6 mg/kg, respectively. Mr. Barksdale further explained that since the methods have now been tested and verified with standards that no more changes are anticipated.

Jim Crane asked if arsenic would be detected if present in groundwater between 50 and 70 micrograms per liter (µg/L).

J. Barksdale answered no, unless it were flagged as being present below the detection limits. He also stated that he went through and compared many of the detection limits to the EPA and FDER drinking water standards and soil clean-up criteria and found that most of the screening detection limits were below the clean-up levels. He continued by stating that this is only a screening technique to get an idea of the compounds at each site. This set of metals will be representative of the types of metals that might commonly occur at the sites.

J. Crane asked if metals are detected during screening analyses will the samples be rerun.

J. Barksdale answered no. Be continued stating that this process is merely for screening purposes and that these same locations may never be resampled. However, if a high level of contamination is detected during Phase I then that particular location will probably be resampled during

Phase II using regular CLP methods with lower detection limits.

D. Criswell added that even if nothing is found during Phase I, the Phase II procedures call for wells to be installed to confirm the absence of contamination.

J. Barksdale agreed and stated that there is no guarantee that at every location this information is going to be known.

D. Criswell continued stating that the original detection limit in the GQAPP for arsenic in water was 60 µg/L.

Ted Campbell stated that the alternative to the screening would be to use standard methods.

J. Crane said that his understanding was that the areas that were contaminated would be investigated further and the areas that appeared clean during Phase I would be resampled during Phase II for confirmation.

J. Barksdale replied stating that on a site that has screening results showing some abnormality they will go back to the spot that has the highest probability of having contamination and continue the sampling during Phase 11.

J. Crane asked if the EPA has given any feedback regarding the screening methods that E & E is using since they are not EPA methods.

D. Criswell answered that the EPA approved the GQAPP and work plans which included these methods. He continued stating they probably had no problem because it is just a screening procedure and that Phase II will continue with the confirmation process.

T. Campbell continued stating that the EPA had a problem with the incorrect revised screening detection limits; however, he is not sure if they will still have a problem with it after the corrections have been made.

J. Crane asked if the total phenols means the total of the listed phenols on the overhead sheets or is it the normal "total phenols" analysis.

J. Barksdale answered that he believes they are reporting the total of any tri-, tetra-, or pentachlorophenols that are detected.

J. Crane said he is assuming that the total phenols is the addition of the specified compounds as one total number rather than separately. He continued saying if the process is as he had just stated then it should be acceptable. The other question appears to have been resolved by restating the concentrations as micrograms rather than milligrams.

Tom Moody asked what is the nature of the sites that might be suspected of having a high amount of arsenic.

J. Barksdale answered that the pesticide sites would be likely candidates.

T. Moody added that it is very unlikely that there would be a "go or no go" based solely on arsenic.

J. Barksdale agreed and said that arsenic has been used in various other things on base such as jet fuel which could be a source of contamination.

J. Crane stated that recent data received by their chemist shows that arsenic is probably not carcinogenic and that the standard number used should be sufficient.

T. Campbell said that there are other issues that need to be addressed.

D. Criswell agreed and continued by asking if the Navy owes the FDER an answer to the phenols question.

J. Crane answered yes, and he would like to knov if the summation of these equals the total phenols.

J. Barksdale answered that the word "total" was used to mean the total phenols on Table 9-2 and not the "total phenols" method.

D. Criswell expanded saying that the text in the work plan should clarify the meaning of this term.

T. Campbell agreed.

D. Criswell continued by s ating tha E & E is sending out another letter to Southern Division with the corrected items and a copy will be sent out to the FDER.

D. Criswell began on another topic by saying that the radiation at the Group G sites need to be addressed. He continued by saying that radiation levels have been recorded at certain locations are which fairly high, and there are some concerns regarding this especially at these sites. There is the possibly that E & E's lab, which is set up for the screening parameters, will not be able to accept radioactive samples. In this case, another lab will be needed to perform the chemical analyses. However, the other lab is not set up to perform screening analyses. Therefore, the proposed approach is that the initial radiation screening be conducted by E & E in the field and, if the readings are above the threshold of E & E's capabilities, then the samples will be sent to the radiation lab for further analysis. He continued by stating that two samples from each site, based on highest OVA headspace readings, would then be sent to the radiation lab for TCL analysis.

J. Barksdale agreed and continued saying that elevated radiation readings were measured near E & E's field trailer by accident. These readings were higher than background readings which are normally 3-5 microRoentgens per hours (µR/hr). The field trailer is located about 1,000 feet from the two Group G sites. In other areas on-base there are also occasionally higher readings (i.e., 30-60 µR/hr) however, these are still rather minor.

J. Crane asked if those were readings on soil.

J. Barksdale answered that the readings were made as they were walking over the ground, and that is why there is some concern. There has been no radiation survey at the two radium sites yet. At a minimum, a gross alpha analysis needs to be performed on soils in these areas to screen and see where the radiation is, if any, and then continue using the headspace method to screen for the volatiles. This can be easily accomplished at the same time, because the soil samples will already be collected. The combined headspace, radiometric and chemical data will be used to determine sampling areas for Phase 11.

J. Crane asked how this differs from what was originally planned.

J. Barksdale answered by saying that all of the samples were originally to be sent to E & E's lab for screening analysis.

J. Crane asked if the methods that are being changed are for the areas which have high radiation readings and will the radiometric lab also conduct analysis for volatiles.

J. Barksdale said that the radiometric lab will not conduct chemical analysis unless it is specifically requested. TCL analysis will be requested for those samples with high headspace readings for each site.

D. Criswell stated that the analytical screening methods that are being used were developed by E & E in accordance with the CLP procedures for developing analytical methods. He continued saying that E & E's lab in Buffalo, New York, will be used and then the samples E & E's lab is not capable of analyzing will be sent to the other lab.

J. Barksdale expanded saying that the radiometric lab, Controls for Environmental Pollution, Sante Fe, New Mexico, is a standard analytical lab; however, he believes that the licensing is the determining factor in regard to what samples may be accepted. E 6 E's lab is not licensed to accept radioactive samples; the radiometric lab is.

J. Crane affirmed that based on the headspace analysis, it will be determined if the other analyses will be performed on the specific samples.

J. Barksdale agreed.

T. Campbell added that there are approximately 15 locations per site with approximately 3 to 4 depth intervals. TCL analysis of soil samples at each location will be decided based on the headspace results.

Eric Nuzie asked if the headspace method has been approved.

D. Criswell answered that it was approved by the EPA after it was explained that the results of the headspace analysis would not write off a site.

T. Campbell asked how the FDER feels about this method.

J. Crane answered that the FDER also uses the headspace for method for soil.

T. Campbell continued that it should be fairly easy to do this with the OVA already there.

D. Criswell stated that the headspace/radiation screening is the approach that is being proposed. He continued asking if this change from the approved work plan would be considered a major or minor change and if it needs to be discussed further or can be decided at this meeting.

E. Nuzie answered that it will need to be discussed further with the EPA.

J. Crane asked if the changed approach will adversely impact the overall objectives.

J. Barksdale answered that the only significant impact is a possible

lower volume of chemical screening data; however, given that the primary concerns at the site are radioactive material and volatiles, the proposed approach should give an initial indication of this.

J. Crane continued asking for clarification on how the samples would be selected for screening versus TCL analysis.

J. Barksdale expanded by saying that, due to radiation levels there will probably be some samples that cannot be analyzed at E & E's lab. These will be sent to the other lab for the chemical analyses, based on the headspace results.

D. Criswell stated that just because a headspace reading is made on a sample, it does not necessarily mean that a TCL analysis will also be conducted on that sample. There needs to be some kind of agreement as to when further analyses will be conducted and when it will not be conducted.

J. Crane asked if the TCL analysis of radioactive soil samples would be considered part of Phase I.

D. Criswell answered yes.

J. Crane continued by asking if after the above approach is conducted would the Phase II sample locations will be selected.

J. Barksdale said yes, and expanded saying that the Phase II approach is different in that smaller depth intervals of soil will be targeted.

J. Crane said that the decision process for how samples will be selected for additional analysis may need to be committed to paper.

D. Criswell suggested that a letter may suffice.

J. Crane agreed.

Regarding E & E's analytical screening method, J. Barksdale explained that the lab will be using solid phase extraction (a syringe with a white substance is shown as an example). The sample is pumped through a cylinder containing a polymer which absorbs the compound out. The lab then removes the polymer/compound and analyzes it. This process is much more cost effective than standard extraction methods which involve the use of a large amount of methylene chloride or other solvent which also has to be disposed of properly after the analysis. This new approach reduces the steps involved in the analytical process.

T. Campbell stated that the next issue to be addressed should be the site management plan, if everyone has had a chance to look at it.

E. Nuzie responded that they had not looked at it in great depth but had very little problem with the original submittal.

T. Campbell explained the schedule and additional sites in the site management plan. He continued saying that there should not be many surprises and that there was some information that had been expanded for the EPA.

D. Criswell asked if there were any FDER comments regarding the schedule or additional sites.

E. Nuzie answered that he believes everything has been covered.

T. Campbell stated that an official letter regarding this matter would be sent to the FDER.

D. Criswell asked if the FDER was aware of a letter from the EPA regarding data format.

T. Campbell stated they should have received the BPA letter dated December 13, 1990, which discusses the EPA data reporting format.

J. Crane said he thought they had.

T. Campbell continued saying that the data reporting format is still being discussed and the EPA format is generally acceptable to Southern Division; however, they do have a few problems with it. He asked if the FDER has any special requirements for the formatting of data or if the EPA format is acceptable.

J. Crane answered that they have not looked into the matter in great detail.

T. Campbell continued saying that data is now coming in and a decision needs to be made regarding the format to be used.

E. Nuzie asked if there is any leeway or is it a set standard.

T. Campbell answered that he believes there should be some room for negotiation with the latitude/longitude location on each sample and how the decision will be made as to whether all data asked for is applicable to every sample.

D. Criswell added that he also feels there should be some leeway and wants some input from the EPA regarding the amount of detail they will require. He continued by asking if there is any particular format or information that the FDER prefers or requires for their program.

J. Crane answered that there is no particular format they require. He continued saying he feels that everyone needs to get together to decide a mutually beneficial format. If the EPA format is reasonable and is an easily readable format then the FDER would not have any problem with it.

D. Criswell said that Naval Facilities is vorking with the EPA Region IV to make sure that the format is a department-vide format and not just one EPA Region IV has put together. He continued saying that there is already a format for environmental data that has been used by the Navy and it should be sufficient.

J. Crane stated that, from the reports he has read, the format seems fine. He continued saying that the EPA is claiming that, according to the FFA, the Navy has agreed to follow Region IV EPA QA/QC SOPs which include the stainless-steel well requirement. He then said that he would like to have this clarified.

T. Campbell answered that this particular copy of the data reporting format is from the EPA Region IV. He continued saying that if the FDER would like to vary from this particular set of standards then they should specify the desired changes and the Navy will try to negotiate with the EPA. He continued by asking if the FDER has any suggestions for change to the format.

J. Crane answered that there may be some things which could be left out to make the data more readable.

D. Criswell stated that it is pretty much up to the Navy to work with the EPA regarding the details.

T. Campbell asked how the FDER feels about the latitude/longitude issue and, if locations can be characterized to within a ten foot radius, would that be acceptable.

J. Barksdale added that, according to this format, locational information is requested down to a thousandth of a second. This can not be done from a standard topographic map unless a detailed survey is conducted. It would also be very difficult to do this when there are two data points just a few feet apart, such as radiation readings. J. Barksdale suggested that the identification of site corners might be sufficient.

J. Crane stated that the FDER has some requirements for this but he is not certain exactly what they are. He feels that there is nothing major that he knows of to conflict with this idea. He also asked what is the point of the information the EPA is requesting.

D. Criswell answered that the reason appears to be so that, at some

point-in-time, a point can be relocated and resampled if necessary.

J. Crane stated that if there is a permanent well then there is no need for such specific information; however, if a large amount of screening is being done then it may be justified.

J. Barksdale said that this can usually be done with pencil and paper, and, depending on the size of the site, can still be within a ten-foot accuracy.

D. Criswell stated that the bottom line is whether it is useful data or not and whether they should be required to be that accurate on the site location.

Bill Kellenberger asked how accurate is a Loran C.

J. Barksdale answered that on land a Loran is not very accurate.

B. Kellenberger commented that it is probably interfered with.

J. Barksdale agreed.

J. Crane stated that a "Lat/Long Device" may work pretty well.

D. Criswell continued by stating that the use of a satellite system might work.

J. Crane agreed.

J. Barksdale stated that satellite might be the thing to use.

D. Criswell continued stating that a dish similar to the ones used by TV trucks to broadcast would work.

J. Crane said there is a hand-held one that may suffice.

E. Nuzie stated that they are probably good to 5-10 feet accuracy.

T. Campbell agreed and continued saying that using something like this could help in the surveying task as well.

E. Nuzie also agreed saying that such a system would be easy to use; the points could be charted and then the field person could immediately move on to the next point.

J. Barksdale continued by saying that a reading could be taken each time that a geophysical measurement is collected and the data could be put into a computer.

T. Campbell stated that something could be worked out with the EPA regarding this.

E. Nuzie asked if the data reporting format is in the work plan.

D. Criswell answered no, and continued saying that he assumes that the data could be put into D-Base and printed out into whatever format is needed.

J. Crane asked if there is some way to put the data on a disk which would be usable on their computer system.

D. Criswell answered saying that the data is being put into a D-Base file by E & E, but that a decision as to the report format has not yet been made.

J. Barksdale stated that there are some field data which have been generated that are not attached to any gridded points.

J. Crane stated that if the data is in an electronic format that he can archive it for their use.

D. Criswell said that the main problem with the data is finding a format

that will be compatible with everyone's system.

J. Crane agreed and stated that his computer people said an ASCII format is needed.

T. Campbell stated that this problem can be ironed out as the situation progresses.

J. Crane continued stating that he would like every report to be accessible to them by their computer system.

D. Criswell suggested that the Navy and FDER computer people should sit down and discuss what format would accomplish this.

J. Crane agreed.

E. Nuzie said that the data on the disk would be raw data only and that the hardcopy would have the text that accompanies the data. This problem should not be difficult to resolve.

D. Criswell stated that Southern Division has a standard report format that they use and would like to continue using for word-processing purposes, and the software usage can be negotiated.

E. Nuzie said there is a topic regarding signs that needs to be addressed.

J. Crane said that Superfund states that a sign should show whether a site poses a risk to the public or the environment. He continued saying that they have interpreted it as saying that a site needs to be posted if areas of potential exposure are easily accessible.

B. Kellenberger said he feels that every site should have a sign stating that unauthorized personnel should keep out.

J. Crane continued by saying that if a site is classified as a Superfund

site then those guidelines should be complied with. He asked exactly what should be done when the site encompasses a whole base.

T. Moody suggested a big sign at the main gate.

J. Crane asked if that could be done or is there a need for each site to be individually signed according to the type of hazard involved.

B. Kellenberger said that if the signs can be seen at all four corners of each site then that should be acceptable. He continued saying that this alternative would be more cost-effective.

D. Criswell stated that the monetary cost is not the issue as much as the public impression. He continued by stating that if there are too many signs that could leave the Navy open to needless lawsuits.

B. Kellenberger said that it would be better to have lawsuits before (exposure) than after-the-fact.

D. Criswell agreed.

J. Crane stated that he his not sure what the FDER point-of-view is on this, but he feels that if there is a hazard then it should be posted.

E. Nuzie said that the investigation process is still in its early stages and this should be taken into consideration.

J. Crane said that at first it had been decided that one sign would be posted stating that it was a study area, and then if something was found an appropriate sign would be posted, but this may change.

T. Campbell suggested that a sign could be put up at the main gate and flyers could be given out which specify each site location. Signs could also be put up where there is some concern of exposure.

D. Criswell agreed this could be a possible way of handling this.

B. Kellenberger stated that there is an OSHA requirement which leans to the safety side that may come into play here.

T. Campbell said that there may be practical problems with the larger sites as to how they will be posted. He continued by asking if there should be one big sign at each place of entry or if many signs should be laid out.

J. Crane said that the rule states that signs should be so many feet apart, so the large sites could be a problem.

E. Nuzie continued by saying that this situation probably needs to be finalized because similar questions have come up regarding formerly leased military sites in Jacksonville and at Cecil.

J. Crane said that he is not sure what level they need to go to get clarification. He continued by saying that once the contaminant pathways are identified, signs could be put in places where the contamination is easily accessible but not in places where contaminants are contained or inaccessible.

D. Criswell stated that this is something that they are continually looking at and when the data comes in a decision will be made as to the procedure. He continued saying that there was at least one site where he would like to see some signs put up as they get information regarding the water bodies. They may want to put up some "no fishing" signs.

J. Crane said that if there are sites that you can look at and see a problem, not just a potential problem, then they may want to put up signs there. If it is not obvious, then wait for the data to come in to decide whether signs should be put up.

D. Criswell stated that there are some sites that are parking areas outside a building that has been paved since a spill. He said he is concerned about putting a sign in this type of area because the exposure

potential is not there.

J. Crane commented that they need to make sure that construction people, who may not know about the site, do not put down a pipe line or something like that.

D. Criswell responded by saying that every construction project has to go through the environmental department on the base.

J. Crane said that this would put some control over these types of activities because they would know about it in advance.

D. Criswell stated that they are now currently awaiting some data on a couple of sites so they can determine which way to go on the design.

T. Campbell stated that this sign issue is something that will need to be discussed again.

J. Crane said that a person involved in the community in Tallahassee has very strong links with the legislator that passed this law. As a result, this legislator probably has very strong view-points on how we are supposed to implement it. If one of his constituents starts complaining about how we have interpreted this we will have a problem.

T. Campbell asked how they feel about well repairs.

J. Crane answered that he does not care as long as nothing is added down the well or causes the integrity to be breached. It depends upon exactly what is done.

T. Campbell asked if they routinely see repairs that are acceptable.

J. Crane answered that he does not normally see the repair jobs. He continued saying that it is sometimes much easier to replace than repair wells because there may be an unseen problem down in the well. He also added that it is probably better to be safe than to save a few dollars

only to find out later that the well is cracked further down and should have been replaced anyway.

B. Kellenberger asked if there is another meeting today.

D. Criswell answered yes, at 1:30 pm. He continued saying that only the major highlights of the investigations will be discussed at that meeting.

There were no further discussions or agreements between the parties present. The meeting was adjourned at 12:15 p.m.

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