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MINUTES OF THE  
PROJECT MANAGERS MEETING  
NAVALAIR STATION PENSACOLA  
PENSACOLA, FLORIDA  
JUNE 16 AND 17, 1992

**August 1992**

Prepared for:

DEPARTMENT OF THE NAVY  
SOUTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
2155 Eagle Drive, P.O. Box 10068  
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The remedial project managers (RPM) meeting was held on June 16 and 17, 1992, in Building 1754 on the Naval Air Station in Pensacola, Florida and commenced at 8:55 a.m. The attendees of the meeting were:

Suzanne Sanborn	- U.S. Navy Southern Division (SouthDiv), Charleston;
Linda Martin	- SouthDiv, Charleston;
James Malone	- SouthDiv, Charleston;
Mickey Hartnett	- U.S. Environmental Protection Agency (EPA), Region IV, Atlanta;
Allison Drew	- EPA, Region IV, Atlanta;
Sharon Matthews	- EPA, Environmental Compliance Branch, Region IV, Athens;
Fred Sloan	- EPA, Environmental Services Division, Region IV, Athens;
Eric Nuzie	- Florida Department of Environmental Regulation (FDER), Tallahassee;
Jorge Caspary	- FDER, Tallahassee;
Ron Joyner	- Naval Air Station (NAS), Pensacola;
Barry Levine	- Ecology & Environment, Inc. (E & E), Tallahassee;
John Barksdale	- E & E, Pensacola;
Craig Smith	- E & E, Pensacola;
Paul Stoddard	- EnSafe/Allen and Hoshall, Inc. (EnSafe), Memphis; and
Henry Beiro	- EnSafe, Memphis.

Suzanne Sanborn began the meeting asking that everyone sign the meeting sheet and stated that the EPA has set an agenda for the meeting. She then suggested that everyone introduce themselves.

Introductions were made.

S. Sanborn continued saying that the CERCLA Remedial Response Immediate

Removal Action Contingency Plan for NAS Pensacola was being handed out to each person and asked if anyone else had anything to hand out. There were no additional handouts. She then turned the meeting over to Mickey Hartnett for presentation of the EPA's agenda.

M. Hartnett stated the EPA agenda contained six items: Item 1) the Navy's responses to comments on the draft Remedial Investigation/ Feasibility Study (RI/FS) work plans for Groups H, I, P and Q (Operable Units [OUs] 11-14), draft RI/FS work plans (Phase 11) for Groups A-E (OUs 1-5) and discussion of the submittal dates for the draft final RI/FS work plans; Item 2) the comments submitted on the draft RI/FS work plans (Phase 11) for Groups F, G, J, K, M and N (OUs 6-9); Item 3) the prioritization of specific operable units so that the identified OU's can be expedited to the Remedial Design (RD) or Remedial Action (RA) Step and reorganizing the sites and the schedules as it relates to the Site Management Plan (SHP); Item 4) the Group O (OU 10) investigation which is the Industrial Wastewater Treatment Plant (IWTP), should be addressed in terms of developing the necessary remedial documents to support the groundwater Record of Decision (ROD); Item 5) the scoping of RI/FS work plans for OU's 15-17 that will include data from samples being taken today by EPA to follow-up the site visit findings as well as discussing upcoming events of Navy Summary Report review and setting a scoping meeting; Item 6) a presentation by ABB and a discussion regarding the proposed transfer of some Underground Storage Tank (UST) sites from the UST program to the CERCLA program.

S. Sanborn commented that a Navy representative, Louis Vasquez (SouthDiv), would be assisting ABB with the briefing that is scheduled for tomorrow morning at 10:30 a.m.

James Malone asked what item the EPA wished to begin with.

Sharon Matthews answered Groups H, I, P and Q (Item 1).

M. Hartnett expanded on S. Matthews answer saying particularly those issues relating to field procedures should be addressed. He continued

saying that S. Matthews and Fred Sloan wanted to be involved in the discussion of these issues and would be leaving later for the planned sampling event.

S. Sanborn asked if the EPA has a work plan for the fieldwork sampling that was being done today.

F. Sloan answered that they have a safety plan but not a work plan. The purpose of the sampling is to get some baseline information for the upcoming Phase II fieldwork. He continued saying that the EPA wanted to: 1) look at the areas proposed to be sampled; 2) install a temporary well, possibly in the Boy Scout Area; 3) evaluate several methods of sampling temporary wells; and 4) take some sediment samples in front of the Site 2 area.

A discussion regarding the need for this EPA sampling event ensued. Various points were discussed such as: 1) would it be a full Target Analyte List/Target Compound List (TAL/TCL) scan; 2) the purpose of the sampling is mainly for safety purposes and to gather preliminary baseline information for the EPA (*i.e.*, Contaminants of Concern [COC]); 3) the use of this information would be for work plan evaluation and scoping purposes (*i.e.*, to decide if divers will be needed in the Site 2 area); 4) this type of sampling is already being proposed in future work on the site but the results would not be available until next summer; 5) the EPA would expect the work plans to be revised based on the COC data received, if the information would warrant it; 6) the results of this sampling would not have to be put into the Administrative Record (AR) because it is only a preliminary sampling; 7) the time frame when the data from this sampling would be available and the possibility it would affect the submittal of the final work plans and an extension may be needed; and 8) the EPA was not aware that the Navy had not been notified of this sampling as required by the Federal Facilities Agreement (FFA). It was generally agreed that the EPA would collect the above-discussed samples and in the future the EPA would notify the Navy in writing of this intent as well as providing them with a copy of the work plan and/or safety plan in accordance with the FFA.

S. Sanborn suggested they continue with the EPA's concerns regarding the Navy's responses to comments.

Allison Drew stated that the EPA's concern is with the phased approach currently stated in the work plans. She clarified EPA's position saying the lengthy reporting evaluation period that breaks up each major field event is partly due to the large number of sites grouped for simultaneous investigation, some of which may or may not be high priority, this slows the process for the higher priority sites. She continued saying that the EPA would like to see a more stream-lined approach to evaluating all of the data as it is collected in the field rather than a gathering of the data for all sites and then the evaluation.

H. Hartnett expanded saying the EPA wanted to get away from the generic "phases" and go to more site-specific "phases" with the intent and purpose of completing the job at one time.

S. Sanborn stated that the Navy has already agreed to this by doing the investigation in two phases with a less formal interim data report in a summary memorandum form and then the second phase would consist of the full characterization of the site. She continued saying that a third or fourth phase would only be necessary if the EPA suggests there is a need for filling data gaps.

John Barksdale expanded on S. Sanborn's statement saying that during the last RPH meeting in Atlanta, Georgia, it had been agreed that from that point on this approach would be used, but that the Navy would not go back and change the previous format of work plans.

S. Sanborn continued saying that it had also been agreed during that meeting that documents would be submitted to the agencies as soon as the Navy receives them to expedite the reviewing process.

M. Rartnett suggested that the focus should be on specific sites and

that this would alleviate some of the problems associated with the batching and phasing approach because the focus will be on smaller pieces of work.

S. Sanborn reiterated a conversation with A. Drew on May 28, 1992, at which time they agreed on the following: 1) finalize the work plans; 2) then put the work plans on hold and regroup the sites; and 3) start again with the sites which are priority sites (i.e., those that are the most contaminated and have had the most progress made).

S. Sanborn asked if all are in agreement that the work plans will be finished as they are, to final form.

M. Hartnett agreed.

J. Barksdale agreed.

M. Hartnett expanded by saying the priority sites should be concentrated on. If, during the course of these investigations, things are found which will change the remaining work plans, changes can be made to fine tune the work plans.

Paul Stoddard asked if the EPA would have a problem with doing a short addendum to the work plans if only minor changes need to be made based on any findings from the higher priority sites.

M. Hartnett answered no.

A. Drew stated that the EPA's first general concern is with the phased approach for Groups H, I, P, and Q (Batch 4) which appears to be the same approach used in Batches 1 and 2, specifically the screening phase. She clarified the comment by saying that the agency is not opposed to evaluating the screening data prior to subsequent investigative work. The agency believes that this process should be expedited to reduce the time necessary to completely characterize the site. EPA would like to see a more streamlined approach to collecting all of the data necessary

to make an on going determination of the site's status instead of the stop and go approach that is inherent to the phased approach.

J. Barksdale clarified that: 1) this is not the approach for all of the groups (such as Bldg. 71 [the old Hazardous Waste Treatment Facility]); and, 2) that this would cause the Navy to completely rewrite the work plans, which is primarily what the Navy objects to.

A discussion ensued regarding the use of the screening phase. It was generally agreed it is a site-specific issue and that every effort will be made to incorporate the screening phase with the second phase of work.

S. Sanborn stated that with the CLEAN contractor (EnSafe) doing the work, they could do a quick-turnaround Phase I and then do Phase II in the areas of concern immediately to expedite the process, if needed. She continued saying that at this point the main consideration is getting the work plans approved.

Eric Nuzie commented that another issue is the high detection limits used where Phase I data was used to determine not to go back for samples during Phase II.

S. Sanborn replied that these detection limits were lowered in the last work plan.

Jorge Caspary stated that the FDER would like to see a copy of those lower detection limits in the work plan. He continued saying that the FDER has no objection to the screening phase but wants the detection limits lowered to a more reasonable level.

S. Sanborn agreed.

M. Eartnett stated that the high detection limits are almost useless for an RI or for determining if a site should be designated as No Further Action Required.

J. Barksdale stated that the purpose of the screening data is not, nor never has been, to make a final determination at a site, such as no further action.

S. Sanborn brought up another issue stating that it was her understanding that the finalized work plan data for Group 0 would not be used by the EPA to write the RI.

A. Drew stated that the existing quarterly data collected during the past 5 years is adequate to make a decision on a treatment system.

J. Barksdale asked if the EPA had really examined the existing data.

A. Drew stated that to her knowledge no one had thoroughly evaluated the data.

J. Barksdale suggested the EPA read the Group 0 work plan summary. He continued stating that E & E had thoroughly examined the existing data and it is not sufficient to support an RI, due to the inconsistent sampling and analytical suites analyzed for during this time period.

M. Hartnett replied that the information gathered in the work plan would not necessarily be used to form an RI. He continued saying that the existing information would be sufficient to write the RI, but that additional information would be needed to evaluate the current pump and treat system for clean-up purposes.

A discussion ensued regarding the Group 0 pump and treat system. The EPA clarified that the work proposed under the current work plan should continue as an on-going project.

M. Hartnett stated that the pump and treat system currently in place is under a Resource Conservation and Recovery Act (RCRA) permit, which is an ARAR, and must be maintained. The Record of Decision (ROD) in question has already been made and is enforceable by law under RCRA.

Any closure under RCRA must include all potential future releases.

P. Stoddard questioned the EPA by asking if the ROD and FS are completed, then is it necessary to do the RI.

M. Eartnett stated that yes additional work needs to be done at the RI stage to completely delineate the extent of contamination, then fine tune the ROD and FS. The system in place will eventually be used to supplement the remedial design system. The RI should be used to substantiate the risk and to cover any aspects of the site which are not currently covered under the RCRA in order to have it added to the RCRA closure plan. Also, the proposed RI work will lead toward the RD work after the ROD is signed.

J. Barksdale clarified the data gaps at the Group 0 Sites as being: 1) extent of contamination not fully delineated; 2) the parameters analyzed for in the past have not consistently been full TAL/TCL because the RCRA permit did not require these analyses; and 3) soil contamination has not been addressed.

M. Bartnett stated that the proposed investigation will determine those potential sources of contamination which are not covered under the RCRA closure process such as soil contamination. The EPA concurred with the Navy that a ROD to be done for Group 0 would be a media ROD, for groundwater only at this time, with RODs for the other media being generated later, if necessary.

A. Drew stated that the EPA's second general topic of concern is the lowering of the level of Data Quality Objectives (DQOs) on the screening sites in order to eliminate them from the system more quickly. She continued saying that this would allow a concentration of resources on the higher priority sites. She also asked for clarification regarding S. Sanborn's earlier statement of going more directly from Phase I to Phase 11.

S. Sanborn responded saying that both phases would still be performed,

but in a shorter time by eliminating the formal interim data reports, evaluating those sites that they know need to be cleaned up first, and having the CLEAN contractor perform the work. She stated that some of the screening sites could be eliminated more quickly if they are assigned a higher priority status. The prioritization of sites will be agreed to later in the meeting.

A. Drew added that some of the screening sites could be eliminated more quickly if the investigation methodology used were altered.

M. Hartnett suggested that as the specific screening sites come up in the prioritization that the three parties (Navy, EPA and FDER) get together during the RPM meetings and make sure that they agree on the strategy for each site including the level of sampling and detection limits that should be appropriate for each site.

A. Drew stated that the EPA's third general topic of concern is that all documents should be consistent with the Standard Operating Procedures and Quality Assurance Manual (SOPQAM) for EPA Region IV and the RI/FS Guidance Document. She continued saying that there were many comments on the revised work plans for site Groups A, H, I, P and Q regarding the field methodologies, as follows: Comment 13 regarding collection and handling of samples; Comment 15-B regarding the use of the mini-ram; Comment 16 regarding use of the OVA; Comment 20 regarding the headspace methodology; Comment 22 regarding the soil homogenization procedures which are missing in the Generic Quality Assurance Project Plan (GQAPP); Comment 26 regarding the use of polyvinyl chloride (PVC) bailers to sample wells; Comment 27 regarding decontamination procedures; Comment 36 regarding general monitoring well installation procedures; Comment 41 regarding sample custody procedures; and Comment 42 regarding how to handle purged development water.

S. Sanborn stated that comment 42 had been addressed by disposing of the purged development water in the wastewater treatment plant on-base.

J. Barksdale stated that all of these field methodology comments stem

from the differences between the EPA's SOPQAH and the Navy's QAPP.

A discussion ensued regarding the revised QAPP approval which had not yet been received from the EPA and the use of the SOPQAM for field procedures.

M. Hartnett stated that these above-mentioned requests for clarification in no way invalidate any of the findings for Batch 1. It is just a way of stating that there is a document which clarifies these field procedures which should be generally followed in the future to ensure consistency of procedures. Mickey elaborated by saying that the EPA Region IV QAPP will be followed by all companies involved with EPA work.

James Malone stated that the Navy understands the need for a uniform QAPP in Region IV, however, the Navy is involved in investigations in several EPA regions and it is difficult to comply with all EPA Region QAPPs.

M. Hartnett acknowledged the differences between EPA Region QAPPs.

S. Sanborn stated the EnSafe is currently developing a QAPP for the upcoming fieldwork.

P. Stoddard stated EnSafe's QAPP will be based on the EPA's SOPQAM. This SOPQAM based QAPP will be used for the December fieldwork EnSafe will be conducting.

A. Drew continued with the field methodology comments as follows:  
Comment 46 regarding the FS by asking for correction or revisions where it disagrees with the FS Guidance Document.

J. Barksdale stated that he would look into it, and that there will be no problem with the FS section of the work plan being consistent with the EPA guidance.

S. Sanborn asked if everyone would like to take a break.

It was generally agreed.

Meeting adjourned at 10:38 a.m.

Meeting was reconvened at 11:05 a.m. with a suggestion that lunch be taken at 11:30 a.m.

It was generally agreed.

A. Drew began by stating that she had only one more general issue to address regarding Batches 1 and 4, and then she will address the draft general comments that EPA submitted on Batch 2 and leave the site-specific comments until after lunch.

It was generally agreed.

A. Drew continued stating the last general comment for Batches 1 and 4 is as follows: Comment 14 under Group H regarding screening data rapid turnaround time. The rapid-turnaround screening data should be used by field teams to modify field procedures and sample locations without interrupting the work.

F. Sloan clarified by stating that the information gathered in the rapid turnaround analysis should immediately be routed back to those persons in the field while they are still mobilized so that any problems can be taken care of that time (i.e., decontamination procedures, field QA/QC, etc.) as opposed to waiting until the study is over and then realizing that there was a problem.

J. Barksdale responded that the rapid-turnaround data was only available for the screening analyses and that this information was used in the field to modify samples numbers and/or locations. He further stated that there was only limited QA/QC data generated with the screening analyses. The QA/QC problems F. Sloan was referring to were mainly associated with the Batch 1 samples run for full protocol analyses and

these data were not available on rapid turnaround. J. Barksdale also said that the Batch 1 QA/QC problems were corrected.

S. Sanborn agreed with J. Barksdale.

A. Drew stated there was a problem with the QA/QC samples in Batch 1, specifically in regard to the metals analyses from the temporary wells which indicated there was a problem with silt or sediments and also organic contamination in the blank.

J. Barksdale answered that he did know what could have been done about that because some of the samples were turbid.

F. Sloan asked if bailers were used.

J. Barksdale answered yes.

F. Sloan suggested that a low capacity pump would allow the sediment to settle first.

Barry Levine answered that this had been tried previously under the FDER site screening program but that it had not helped much. He continued saying that longer screen lengths and sampling with peristaltic pumps had been used with turbidity being the only parameter which improved. He added that other methods had also been used with no success.

S. Matthews asked what size screen was used.

J. Barksdale answered five feet of screen with 0.01-inch slot size.

S. Sanborn stated that the methylene chloride problem in the Batch 1 samples had been corrected.

J. Barksdale stated that it would be very unusual to not detect any methylene chloride and that the EPA recognized this compound as a common laboratory contaminant.

S. Matthews commented that the amounts of methylene chloride detected were very high.

J. Barksdale asked if the sample was diluted.

S. Matthews answered that she did not know.

F. Sloan stated that if it were diluted then the amount reported should have been adjusted for the dilution.

Henry Beiro commented that this would not have been done if they were looking for a target analyte.

B. Levine said that most of the samples the EPA was referring to had been diluted because there was another target analyte at a concentration high enough to require a dilution to get quantification. He continued saying that this process increases the apparent methylene chloride concentration. He added that during Batch 1, the screening samples did not have field QA samples (other than duplicates) so any QA samples that were showing problems would have to be lab QA samples (method blanks).

F. Sloan stated that there were some rinsate blanks done in the field.

J. Barksdale answered rinsate blanks were not collected on screening samples but they did resample some existing wells using full Contract Lab Program (CLP) protocol, if that was what he was referring to.

F. Sloan answered he was not sure, but he knew that there were some rinsate and preservative blanks collected. He continued saying that the preservative blanks did have some high metals detected which should have been corrected in the field.

J. Barksdale stated that the CLP analysis preservative blank results were not quick turn-around and therefore could not have been corrected in the field.

P. Stoddard asked if the methylene chloride or artifacts dropped out using the five-time or ten-time rule on the method blanks.

J. Barksdale answered that there was no major problem to be concerned with. He continued saying that there were a couple of cases where toluene showed up and it looked like it was a false positive and was identified as such in the report.

S. Matthews stated that reports which she reviewed in July 1991 showed that 14 different compounds were detected in the method blanks which shows a serious QA/QC problem.

B. Levine stated that if there were that many organic compounds detected they would probably fall under the Tentatively Identified Compounds (TICs).

S. Sanborn commented that this issue was discussed during the January 1992 RPH meeting and the meeting minutes are available for review regarding this issue.

A. Drew stated that there still seems to be some QA/QC problems in the Batch 2 sampling and that the EPA would like to see a better effort made to use the quick turnaround data to correct these problems.

J. Barksdale responded saying that the quick turnaround data applies to screening. The problems she is referring to are not in the screening phase so there is no way in which they can be corrected quickly (i.e., in the field). He continued saying that these problems are not uncommon for any lab.

A. Drew suggested that they address the general comments on Batch 2, which were faxed to the Navy in draft form a few days ago.

S. Sanborn stated that she faxed the comments to the necessary people but that she had not looked over them yet.

M. Hartnett suggested that A. Drew go over the comments anyway.

A. Drew began going over the comments as follows: Comment 1 regarding adding more pertinent site features to the site maps (i.e., the industrial sewer lines); Comment 2 regarding making better use of the quick turnaround data; Comment 3 regarding a proposed more stream-lined approach to conducting the investigation; and Comment 4 regarding the insertion of a section on DQOs in the work plans.

S. Sanborn asked why a section on DQOs would be needed in the work plan when it is already in the GQAPP.

A. Drew asked if there was a section on DQOs in the QAPP.

M. Hartnett asked if the GQAPP DQOs are generic.

S. Sanborn answered yes.

M. Hartnett clarified by asking if the designated specific DQOs could be included in the work plans for a particular site or investigation. He then stated that the EPA wished to refer to page two, paragraph a, and retract the reference to the revised Hazard Ranking System (HRS).

A. Drew continued as follows: Comment 5 requesting that in Phase II the vertical and horizontal extent of contamination be fully delineated.

J. Barksdale stated he does not understand that comment, because that is what is in the work plans. In reference to EPA's statement that samples must be taken from the surficial and main producing zone in the Sand-And-Gravel Aquifer, it is E & E's philosophy that unless they believe there is a reason to breach a confining unit, and install a well in the main producing zone, that this would not be done.

M. Hartnett commented that in this statement the EPA was assuming that there was some contamination detected and therefore further

investigation was needed. He continued saying the EPA wanted to get away from the incremental "hunt and peck" and get full lateral and vertical delineation of contamination unless there is some concern about cross contamination.

B. Levine clarified E & E's position stating that in areas where there is clear evidence of shallow groundwater contamination, at a minimum they will go down to the top of that confining unit. He continued saying that only on sites where there is good reason to believe there is contamination at this point would they breach the confining unit and go into the main producing zone.

M. Hartnett commented that this would be a site-specific issue but the EPA feels that at some sites it would be beneficial to do well clusters instead of going back and putting a new deeper well at a later date.

J. Barksdale responded that EPA's comment on this seemed to be a very generic approach. He further stated that the possibility of installing deeper wells was taken into consideration at each site based on screening data, and where it was considered appropriate that further sampling at depth has been proposed.

M. Hartnett stated that these comments are draft and that this meeting is partly to help the EPA smooth out the comments and make sure that they are getting the appropriate point across.

A. Drew continued with the comments as follows: Comment 6 requesting full TAL/TCL analytical scans for soil samples which are collected beneath the surficial zone water table; Comment 7 requesting aquifer tests as early as possible in the investigation to quickly determine the design parameters for the pump and treat system; Comment 8 regarding a request for a three-dimensional model instead of a two-dimensional model to be used where appropriate; Comment 9 regarding the inclusion of federal Maximum Contaminant Level (HCL) standards as well as the state standards for drinking water; Comment 10 regarding the data gap for risk assessments for surface soil 0-1 foot below land surface (BLS); and

Comment 11 regarding EPA's desired to have the habitat biota surveys included in the work plans.

S. Sanborn stated that in the January 1992 RPM meeting that a comprehensive overall habitat biota survey had been agreed upon.

J. Barksdale addressed comment 11. He said that some of these sites are completely paved. A habitat biota survey on these sites is not necessary.

A. Drew requested that a short paragraph to that affect be included. She continued saying that a brief summary of site conditions would be acceptable.

J. Barksdale answered that this has been done and the information should be available in the interim data reports.

A. Drew stated she believed that a section in the work plans was missing regarding this issue.

J. Barksdale commented he would look into it.

A. Drew continued with the comments as follows: Comment 12 regarding performing biological sampling as soon as the need for it is recognized; Comment 13 provides some recommendations for interim data reporting; Comment 14 regarding the revision of the FS section of the work plans; and Comment 15 regarding the recommendation for submittal of the formal RI with a series of three separate technical memos.

M. Hartnett suggested that they could break for lunch.

It was generally agreed.

The meeting was adjourned for lunch at 11:49 a.m.

The meeting reconvened at 1:00 p.m.

H. Hartnett asked if there were any objections to the agencies having a brief discussion without the contractors (E & E and EnSafe) being present before the meeting reconvened.

There were no objections.

The contractors were asked to step out of the meeting at 1:05 p.m.

The contractors were asked to return at 1:37 p.m.

The meeting reconvened at 1:42 p.m.

A. Drew began with site-specific comments for Groups E, I, P and Q. Comment 21 for Group H regarding Section 13.2 stating that residual fuel was disposed of to the east northeast of Building 1681. She continued saying that the the figure indicated there were no samples being proposed near that corner of the building. She questioned why this area was not being sampled.

J. Barksdale answered that the sampling locations were chosen based on the results of the 15 soil borings performed by Geraghty & Hiller and that the Navy feels the proposed locations will confirm that there is no contamination there.

A. Drew continued with Comment 25 for Group H regarding the vertical extent of delineation. She said that she understood the rationale behind not putting a well into the main producing zone if a need is not justified. She continued stating that a well should be installed into the low permeability zone, and that it should not be a problem to collect additional information on that zone.

J. Barksdale commented that this would be possible except it is quite risky to install a well in a zone of unknown thickness when there is'a chance of drilling through the low permeability zone. He questioned the

benefit of installing a well in this zone.

A. Drew clarified her comment by stating the purpose of installing a well in this zone would be to collect aquifer characteristic data.

J. Barksdale stated that wells screened above and below the confining unit and a shelby tube sample of the confining unit for permeability testing should suffice for determination of the aquifer characteristics.

A discussion ensued regarding the installation and positioning of deeper wells. The EPA and FDER made the request for an interactive approach to work plan development. For example, if the need for deeper or intermediate zone wells is determined, based on available data, then add the deeper wells and allow for this type of flexibility in the work plans on a site-specific basis.

L. Martin replied that the cost plus type of contract will also allow for more of this type of flexibility.

A. Drew continued with Comment 11 for Group I regarding the proposed Phase I shallow wells which bracket the water table. She continued saying that the EPA feels that if there is a potential for these dense non-aqueous contaminants to be present, it would be appropriate to install one or two wells toward the base of the surficial zone to detect the more dense contaminants. She suggested that this issue be looked at for Batch 4 to evaluate if it would be appropriate to install these wells at the base of the surficial zone.

L. Martin said that the decision to install deeper wells would need to be based on analytical data.

S. Sanborn stated to the contractors (E & E and EnSafe) that the decision had been made during the earlier closed-door discussion that the work plans would be finalized and an addendum would be done if revisions were necessary.

J. Barksdale asked if the only necessary change to the work plans would be the statements that: 1) based on the results of Phase I, while in the field it may be determined that intermediate depth wells should be installed; and 2) more or less wells than originally proposed may be also required as determined by field data or by additional data that becomes available from other investigations.

S. Sanborn added that this approach would be implemented once the fieldwork started and the work plan would be amended just before fieldwork begins, if needed.

J. Barksdale expressed a concern regarding the potential for someone to misunderstand this statement and go deeper than necessary, i.e., drilling through the confining unit.

L. Martin commented that she understood the concern but that before any extra field activities could be initiated, the proposed additional work would have to be discussed and agreed upon before any action can take place.

S. Sanborn reiterated the points of the discussion as follows: 1) the work plans will be finalized; 2) the work plans will be pulled out as needed to implement the fieldwork; 3) they will have a scoping meeting to discuss any necessary changes before fieldwork is begun; and 4) based on the scoping meeting, an addendum will be done to the work plans, if needed.

A. Drew continued with Comment 40, which referenced the Florida Department of Natural Resources (FDNR) comment regarding moving the topographical survey up in the process so that the information could be used to strategize for sampling locations.

J. Barksdale answered that it did not seem to make much sense to go to such considerable expense on a site which may not require an engineering survey for any other purposes such as remedial design. He continued saying that if the goal of this survey is to identify surface water

pathways that a walkover would accomplish this.

B. Levine stated that in the Batch 1 work plans the nomenclature was changed to read "engineering survey" instead of a "topographical survey." This survey, if required would be used to support remedial design.

A. Drew stated that this was fine if this type of survey would not be needed. She continued with Comment 5 for Group I regarding the suggestion to collect soil samples from 6-12 inches in addition to the proposed 0-6 inch sampling.

H. Beiro asked if this would be an additional sample or a composite sample collected from 0-12 inches.

B. Levine asked for clarification. Is the EPA requesting that instead of a sample being collected from 6-inches to 2.5 feet, that a sample be collected from 6-12 inches?

A. Drew answered that the EPA risk division classifies surface soil as 0-1 foot and that this should be the appropriate sample interval.

B. Levine stated this was new to him and that for risk assessment purposes the standard protocol is 0-6 inches then 6 inches to 2.5 feet. This is the first time he has heard of these intervals.

J. Barksdale stated that E & E has asked their risk assessment people who work at many locations across the country what the appropriate sample intervals are and that is how they determined the protocol that B. Levine outlined.

A. Drew stated she would talk with the risk assessment division regarding this question and provide a reference to this effect.

S. Sanborn asked if they could get a response quickly because the work plans are being finalized.

M. Hartnett stated they would try to get an answer today, if possible.

H. Hartnett then left the meeting to make a phone call to resolve the question.

A. Drew continued with Comment 7-a for Group I regarding a request for an additional well by stating that this is an example of where an interactive approach would be beneficial. She then continued with Comment 4 for Group P regarding the two different types of air survey sampling being done, one of which is the emissions survey/particulate air sampling and the other is the preliminary screening associated with the field reconnaissance survey. She asked if it would be practical to combine these two air sampling events.

J. Barksdale answered that it would not be practical to do this because the emissions survey is usually done on a grid and the field reconnaissance preliminary screening is for health and safety reasons and would be done anyway. Particulate sampling is a site specific event not usually associated with the emission survey,

A. Drew continued with Comment 5 for Group P questioning why sediment samples are not being analyzed for full TAL/TCL parameters in the lab.

J. Barksdale answered that this site is covered by 8-10 inches of concrete and the site contains approximately 500 feet of drainage ditch. He added that the sediment samples are exclusively from the drainage ditch. He continued saying that the RCRA site drained their sludge into this area, and therefore, this is the area of concern.

A. Drew asked how many sediment samples were proposed for this site.

J. Barksdale answered approximately 16 sediment samples with one duplicate.

A. Drew asked how many samples of other media were proposed.

J. Barksdale answered there were a total of 21 soil samples in seven locations as opposed to 16 locations for sediment samples.

A. Drew suggested that while sampling for full TAL/TCL in the other media that the sediment be analyzed for these parameters as well.

J. Barksdale commented that if this were done then he would recommend a smaller number of locations be sampled and these sediment samples should be analyzed for Toxicity Characteristic Leaching Procedure (TCLP) to facilitate disposal methods.

S. Sanborn suggested that this may have already been done under the RCRA cleanup and this aspect would have to be looked in to.

J. Barksdale suggested that this area could be addressed by RCRA and sampling locations be reduced to about 4 locations.

A discussion ensued regarding this site and the screening process.

B. Levine suggested that upfront in the work plan a qualifier be added that, based on the Phase I results, additional samples for full TAL/TCL and/or additional wells will be added, if needed.

This issue was not resolved at this time.

M. Hartnett referred back to the request for information regarding the 0-12 inches risk assessment soil samples issue saying that the EPA Region IV Risk Assessment Group has made this recommendation for the southeastern region and that it is not in any national guidance. He continued saying that it is only a recommendation and that if 0-6 inches is used then the EPA could work with that unless there is some site-specific reason to do otherwise.

J. Barksdale asked what is generally accepted by the risk assessment community and if there were some national standard regarding the depth

of soil samples.

M. Hartnett answered that there is no national guidance for soil sampling depth, the sample interval should be based on the potential for exposure to surface soils. He would verify this and get back to him on Friday with an answer.

J. Malone suggested that they take a break.

It was generally agreed.

The meeting was adjourned at 2:40 p.m.

The meeting reconvened at 2:55 p.m.

A. Drew continued with the Batch 1 comments, Comment 7 for Group A regarding the proposed soil sampling at the landfill area and asked for clarification on the number of sample locations.

J. Barksdale answered that the area is too large for random sampling which would not be cost effective. He continued saying they identified the areas which needed sampling and they could find no reason or basis to collect any samples in areas other than those proposed.

B. Levine clarified that the geophysical grid and aerial photographs were used successfully to determine the areas which needed to be targeted with the soil samples.

ti. Hartnett asked if the landfill area boundaries had been determined and if the landfill had any type of liner under it.

B. Levine answered that the geophysical data and the Phase I data delineated the landfill area very well.

J. Barksdale continued answering that he doubted that any type of liner had been used in the landfill.

L. Martin stated that with the cost plus type of contract in place, additional sampling could be performed to allow for further delineation, if needed.

A discussion ensued regarding the various methods used for delineating and the possibility of capping the entire landfill.

A. Drew continued with Comment 9 for Group A, a request for additional monitoring wells. She continued saying that the response to this comment seems incomplete with regard to the well EPA had requested west of TW001 to determine if metals or organic contaminants are present.

J. Barksdale stated that E & E did re-evaluate this request for the well and found that it was unjustified based on the fact that the concentrations detected were barely above the federal MCLs.

A discussion ensued regarding the rationale and various resources used to make this decision.

A. Drew asked if they could look at the work plan for this group after the meeting and discuss it further.

J. Barksdale asked Ron Joyner if he had a copy of the Group A Interim Data Report and the revised work plan.

R. Joyner answered that he would look for it.

A. Drew continued with Comment 10 for Group A regarding the request for surface water and sediment samples to be collected in pairs. EPA feels the response was not adequate to address the comment.

J. Barksdale responded saying that, short of doing a full-blown hydrodynamic study, he felt their response was adequate in explaining their rationale behind the sampling.

B. Levine stated that for the most part surface water and sediment samples are taken in pairs with very few exceptions. He continued saying that the few (3) proposed sample locations which were sediment samples only were proposed because E & E felt that there was too great a distance between the surface water/sediment sample locations and wanted something in between.

H. Beiro asked for clarification of J. Barksdale's statement. He asked J. Barksdale if what he meant was that there is little or no correlation between sediment and surface water contamination.

J. Barksdale stated that basically that is true.

H. Beiro continued with the question of what objective would be necessary in comparing a homogeneous population of water samples versus a heterogeneous population of sediment samples.

A. Drew asked for clarification of the question.

H. Beiro restated his question, what objective would you hope to gain by sampling a homogeneous, mobile, easily transportable matrix (water) as opposed to a heterogeneous sediment sample.

B. Levine agreed that it should not be necessary to collect all sediment and surface water samples in pairs.

M. Hartnett commented that this rationale answers their question regarding the sampling pairs but that this should be explained in the work plan for clarification.

A. Drew continued with the last comment, Comment 7 for Group B regarding EPA's request for one additional well to be located west of boring B015 on the west side of the road where groundwater contamination was present upgradient of this location. She asked why this comment had not been responded to.

J. Barksdale asked if the EPA was satisfied with the other responses.

A. Drew answered yes.

J. Barksdale stated that he did not know why it ~~was~~ not responded to but they would look at it and respond later.

B. Levine stated that in general on Sites 11, 12 and 26 because of the close proximity of these sites, an upgradient well on one site may be a downgradient well at another site and that the proposed locations of wells at each site had to be viewed together.

A. Drew agreed. She continued saying that the EPA would be sending a letter stating that the EPA conditionally approves the work plans for Groups H, I, P and Q.

A general discussion ensued of various topics between different individuals. No agenda items were discussed and no issues were resolved.

J. Barksdale stated that he would like to add to the response to Comment 9 for Group A regarding the request for a well west of TW001. He continued saying that the permanent well GH-33 was analyzed for full TAL/TCL and the only compound which exceeded Florida drinking water standards was benzene which was detected at 5 µg/L with the standard of 1 µg/L. He commented that based on this low concentration there was no reason to go downgradient for something that low.

M. Hartnett asked if BTEX compounds had been detected.

B. Levine answered that the BEX compounds were detected in some samples near the trench, but not toluene. The primary contaminants of concern at these sites are the metals.

S. Sanborn suggested that the prioritization of the RI/FS sites be discussed.

S. Sanborn presented the Navy's priority ranking of sites. A discussion ensued with the following prioritization of sites being resolved. The primary rationale used to prioritize these sites is which sites present the greatest risk and which sites can be completed with ease.

Level I-Highest Priority

- 1) Sites 25. and 27
- 2) Sites 32, 33, 35 and includes 13
- 3) Site 39
- 4) Site 1

Level II-Next Highest Priority

- 5) Sites 30, 11, 36, and 2
- 6) Sites 40, 41, and 42
- 7) Site 38

M. Hartnett stated Level I and Level II will be scheduled for funding in the coming years, other lower priority sites will fall into place after these are begun.

S. Sanborn stated she would like to have a meeting to discuss additional site prioritization closer to the Federal Facilities Agreement Site Management Plan (SMP) delivery date and to finalize the other reports at this time.

M. Hartnett agreed.

S. Sanborn asked if the Navy needs to request another extension for the draft final reports on Batches 1 and 4 or if it acceptable to finalize these reports with the incorporation of the changes discussed today.

A. Drew asked if the Navy would have a problem with incorporating the changes for the submittal of the draft final reports within the 20 day

period they had previously discussed.

S. Sanborn answered she did not think so because most of the changes were minor. She continued saying that the only issue unresolved at this point is if there is a national guidance for the 0 to 6-inch or the 0 to 12-inch sampling interval discussed earlier.

A. Drew stated that after this meeting a conditional approval memorandum could be sent out.

J. Barksdale asked for the due dates to the agencies for Batch 1 and 4 revised work plans.

S. Sanborn answered for Batch 1 (Groups A-E) the due date is 20 days from June 23 and for Batch 4 (Groups H, I, P and Q) it is 20 days from June 13.

M. Hartnett stated that the EPA is currently compiling all background data available on Group 0, into an electronic database for easier use.

J. Malone asked for the schedule on the availability of this electronic database.

M. Hartnett answered that it would probably be another month before it is completed.

J. Barksdale commented that E & E is also inputting the Group 0 data into a database and may be further along with it than the EPA. He also said that there is probably no point in both E & E and EPA doing the same task.

M. Hartnett asked if the EPA could have an electronic copy of the information. He continued saying the EPA would discontinue inputting the information if E & E could provide this to the EPA upon completion.

J. Barksdale answered yes. He continued saying that after it has all

been put into the database and checked they would provide a copy of it to the EPA.

A. Drew asked if E 6 E could provide a skeletal file to the EPA so a conversion program could be written.

J. Barksdale suggested that the EPA should call the E & E Pensacola office and talk with him and Michael Bennick regarding the specifics of the database.

S. Sanborn commented that she had requested that E & E notify the Navy when they are finished with inputting all of the data.

J. Barksdale clarified that it would probably be mid-July before the data will be complete. E & E will notify the appropriate people at that time.

H. Hartnett stated that the EPA is in the process of digitizing all site maps. Also, the EPA will give a presentation to SouthDiv regarding these maps.

S. Sanborn asked if the contractors were welcome to attend the meeting at SouthDiv to demonstrate the new digital mapping system.

M. Aartnett answered yes.

Louis Vasquez (SouthDiv, Charleston) entered the meeting.

S. Sanborn asked L. Vasquez if ABB could change their presentation time from 10:30 a.m. tomorrow morning to 9:30 a.m.

L. Vasquez answered yes.

S. Sanborn asked if the meeting should reconvene at 8:00 a.m. tomorrow to cover the rest of agenda items 5 and 6.

It was generally agreed.

The meeting was adjourned at 4:25 p.m. to reconvene tomorrow June 17, 1992 at 8:00 a.m.

The meeting reconvened on June 17, 1992 at 8:10 a.m.

S. Sanborn began the meeting asking what item to begin with.

B. Levine stated that he would like to respond to Comment 7 for Group B which was discussed yesterday, regarding the EPA's request for one well to be located west of boring B015 on the west side of the road. He continued saying that boring B015 showed only low levels of poly aromatic hydrocarbons and phenols, and that these were present only in the A interval soil samples. He stated that the B, C and D intervals showed no contamination in this boring and that 100 feet downgradient from this location a temporary well had been installed. At that location the D interval soil sample showed 25,000 mg/kg phenols. This temporary well downgradient of the boring B015 detected no contaminants in the groundwater. He further commented that they do have a well and boring being proposed for Phase II in this area. He stated, based on this information, the Navy did not understand the rationale for a well upgradient from the boring B015 location.

A. Drew agreed that a well was not warranted in this area.

S. Sanborn asked if A. Drew wanted to discuss the RI schedule.

A. Drew stated that the RI schedule would rely upon the completion of the data currently being put into a database by E & E, which is scheduled to be completed in mid-July. She continued saying that Richard Hammond or Jonathan Bordeaux would contact E & E for a copy of the skeletal file. She then passed out a tentative schedule for the Group O RI schedule.

S. Sanborn asked the FDER if they had any problems with the Navy's

responses to the FDER comments.

J. Caspary answered the only problem they had was with the disposal of investigation derived waste (IDW). Specifically, FDER did not have a problem with spreading the cuttings around the well and treating the water through the waste water treatment system. He commented that their main concern is with spreading highly contaminated cuttings if there is any possibility of someone coming into contact with this soil. He continued saying all other comments were resolved to FDER's satisfaction.

J. Malone stated that they would look into having the highly contaminated cuttings drummed and removed.

E. Nuzie suggested they look into the EPA guidances regarding this.

A. Drew stated that the EPA had no problem with disposing of the waste water in the wastewater treatment plant or with disposing of the tyvek and other investigation derived materials as suggested in the landfill. She continued saying that the main concern would probably be with the cuttings. She stated she would look into all of these issues and respond later.

A discussion of IDW ensued. It was generally agreed that the best approach to handle IDW would be to evaluate it on a site-specific basis.

E. Nuzie commented that the acceptability of the disposal method should be based on the analytical results received.

A. Drew agreed.

E. Nuzie asked if an analysis would be run on the waste before disposal.

J. Barksdale answered that any excess soil generated by drilling activities could be drummed and then disposed of after the analytical results are received. He continued saying that this is the process

which had been used in the past and seems to work fine.

A discussion ensued regarding the groundwater **RI**, **FS**, and **ROD** for Group O. This discussion included cost comparisons and various design options of the pump and treat system. The following items were resolved: **1)** as the **RI** is being developed the **EPA** will fax it to the Navy; **2)** the Navy will do the **FS** based on the **EPA's** **RI**; **3)** the **EPA** would send a proposed **RI** schedule in letter format in a couple of weeks; **4)** **EPA** will start the work on the **RI** after all of the data is available in electronic format around July 15; **5)** the electronic summary of data will be incorporated into the **ROD** as will the data generated during the **RCRA** closure; **6)** the **RCRA** closure plan will be developed based on the expedited plan using the new public notice and public hearing periods required under the new permit regulations; **7)** the modification to corrective action and modification to the **ROD** will probably be done at the same time to expedite the process; **8)** the **EPA** will do an "interim" or partial baseline risk assessment and the Navy will do the final; and **9)** the **EPA** will have the **RI** outline together by mid-July and the draft document out by mid-August.

M. Hartnett presented two groundwater samples which were collected from an **EPA** installed well point as an example of proper temporary well development using a peristaltic pump.

B. Levine stated the problem with the metals contamination and turbidity is trying to distinguish where the metals are actually present in the groundwater and where the metals are the product of acid leaching from sediments. In reference to Mr. Hartnett's samples, he said that one sample does not make a statistical model.

M. Hartnett stated that perhaps if more time and a different purging method were employed, the samples would have contained less sediment.

B. Levine then stated that the relatively clear sample collected by the **EPA** still contains sediment. Because of the natural ambient metals concentration of the sediments, a small amount of sediment may cause the

metals concentration to exceed drinking water standards.

Nothing was resolved.

S. Sanborn asked if everyone was satisfied that agenda Item 5 had been fully addressed.

It was generally agreed.

A. Drew asked if there were any questions comments or suggestions regarding the memorandum which the EPA recently sent to the Navy.

S. Sanborn commented that some of the comments would be handled by the revised work plan. She continued asking if the EPA had read the comprehensive data report yet.

A. Drew answered that it was currently being reviewed.

S. Sanborn stated that this report may also have included some previous sampling events in it as well. She continued saying that she had a problem with the EPA comments regarding fish sampling and wildlife sampling.

M. Hartnett commented that the purpose of this meeting was to clarify things now and not later. He continued saying that by resolving any "wild ideas" now and not at a public meeting it would be to the benefit of all parties involved.

J. Barksdale suggested that EPA read the comprehensive data report and that staff with biological background be present for discussion when these issues are addressed. He also suggested that everyone read the reports and comments then discuss the details at the future scoping meeting.

S. Sanborn stated that they have the scoping meeting in mid-July, possible on the 21st or 27th of July.

A. Drew stated that the EPA may not have all the comments on this work plan together by mid-July. **As** soon as they are available, **A.** Drew will call S. Sanborn to set up a meeting.

S. Sanborn reminded the **EPA** that because the work plans for OU's 15 through 17 are due to the **EPA** in December the meeting needs to take place in July **so** the work plans can be completed.

**A.** Drew asked when EnSafe will start work on the work plans.

H. Beiro responded that work will begin as soon as the Contract Task Order is actually initiated, hopefully within the next week or **so**.

S. Sanborn clarified that they will take all of the information and comments discussed here as well **as** the results of the scoping meeting, if this takes place within a reasonable time frame, and deliver the reports on schedule.

**A.** Drew commented that the **EPA** wanted the Navy to use the results from the Environmental Services Division (ESD) sampling in July and use it to develop the work plans. She continued saying that if the due date for these is unreasonable then an extension can be made for the work plan submittal.

S. Sanborn agreed that an extension may be necessary for the work plans and that the modified **SMP** should be submitted in September.

H. Beiro asked for clarification regarding the objectives of the sampling to be done in July by the **EPA**.

**M.** Hartnett answered that it was for baseline information and to help design future RIs.

**A** discussion ensued regarding the July sampling by the **EPA**. No issues were resolved.

P. Stoddard requested a copy of the July sampling work plan and the safety plan for the Navy and EnSafe's files.

M. Hartnett agreed.

The discussion regarding the July sampling and the use of the data continued.

S. Sanborn restated that the scoping meeting would be held at the end of July with the specific date to be determined at a later time. She also requested that the Navy have a chance to look at the work plan for the July sampling before it is performed.

A. Drew stated that the ESD field work schedule was firm and changing it would be difficult.

S. Sanborn suggested a break before ABB's presentation.

It was generally agreed.

The meeting was adjourned at 9:13 a.m.

The meeting was reconvened at 9:37 a.m. with ABB's presentation.

The following persons entered the meeting at this time:

Louis Vasquez	- SouthDiv, Charleston;
Jim Williams	- ABB, Tallahassee, Florida;
Michael Kern	- ABB; and
Roger Durham	- ABB.

Roger Durham made a presentation to the RPM meeting members regarding the results of ABB's investigation of underground storage tank sites at NAS Pensacola. The purpose of the presentation was to demonstrate that on many of the UST sites ABB had detected non-petroleum compounds which

appear to be related to some of the CERCLA sites which are nearby.

J. Malone commented that these sites where non-petroleum compounds were found may need to be moved from the UST program to the CERCLA program based on ABB's findings. He then asked the EPA what their opinion was on this subject.

M. Hartnett stated that it was possible that ABB could continue to investigate these sites. This approach would minimize the disruption of fieldwork. EPA would like the state FDER to be the lead on these sites.

J. Barksdale suggested that the UST sites which appear to be directly associated with the CERCLA sites should be pulled out of the UST program and included in the CERCLA program for efficiency.

J. Malone commented that they would consider which sites should be moved under CERCLA and which should stay under UST. It was decided among the Navy, FDER and EPA that the following UST sites would be transferred to the CERCLA program: UST Sites 604S, 32203 and 3220S would be moved to CERCLA Site 36; UST Site 709D would be moved to CERCLA Site 27; and UST Sites 6473, 647N, 648N, 649N and 649W would be moved to CERCLA Site 30.

M. Hartnett asked if any decision had been made regarding the action memorandum for the Oakgrove Campground clean-up effort.

S. Sanborn answered that they would have to look at the FFA SMP schedule and the available funding and meet later to discuss this issue.

M. Hartnett suggested, in regard to the radiation sites, that the proper safeguards be put into place as soon as possible.

S. Sanborn stated she would discuss these safeguards with R. Joyner. She asked if anyone had any more questions or concerns.

There were none.

The meeting was adjourned at 10:14 a.m.