
**U.S. ENVIRONMENTAL PROTECTION AGENCY MEETING
FEBRUARY 3 & 4 1993**

ATTENDEES

N00204.AR.000507
NAS PENSACOLA
5090.3a

Allison W. Drew, RPM, USEPA Region IV
Mary P. Andruff, USEPA ORC
Jorge R. Caspary, Base Coordinator, FDER
James J. Crane, Section Admin., **FDER**
Eric S. Nuzie, Federal Facilities Coord., **FDER**
Brian Caldwell, EnSafe/Allen & Hoshall (E/A&H)
Paul V. Stoddard, EnSafe/Allen & Hoshall (E/A&H)
Henry H. Beiro, Ensafe/Allen & Hoshall (E/A&H)
Jennifer Herndon, USEPA, GWTU
Fred Sloan, Environmental Engineer, USEPA Region IV
Mickey Hartnett, Chief DOD Remedial Section, USEPA Region IV
Linda A. Martin, EIC, SOUTHDIV
Stephen Beverly, Attorney, SOUTHDIV

FEBRUARY 3, 1993
MINUTES

- 0900 L. Martin opened by presenting maps of NAS Pensacola (NASP) illustrating the different types of sites to **FDER** and USEPA.
- 0915 H. Beiro presented site history for PSC 36. An outline of the presentation and handouts **are** attached to this record of minutes.
- 0935 H. Beiro opened discussion of **areas** near **and** along PSC 36 that **are** "hot spots" based on Phase I **data** collected by E & E. He then presented **all** relevant Phase I **data**.
- 1000 H. Beiro presented **PSC 30 data**.
- 1030 Break
- 1045 H. Beiro presented a synopsis of the **PSC 36 Work Plan** with **an** overview of the objectives and E/A&H's approach. **USEPA** requested a copy of the camera survey (1987) of the sewer line.
- 1105 Break for lunch

February 3, 1993 minutes continued...

- 1240 L. Martin reconvened with discussion of approach to PSC 36; investigate as individual sites, or combine? EPA officials indicated that PSC 36 **can** be divided, but the entire area needs to be investigated. L. Martin began describing specific portions of PSC 36 to be included with other sites. Martin then asked if Navy could proceed with Phase II on the middle portion (Big Green) of the site, find discrete hot spots, and conduct **an** Interim Removal Actions (IRAs). By proceeding in this fashion, the site can remain a screening site rather than an RI.
- 1340 **Break**
- 1400 L. Martin informed **EPA** that smoke, dye and pressure **will be** used to test 36 integrity. Fred Sloan expressed concerns about floor drains leading on the lateral to main line. Eric Nuzie said he might get FDER to ask PWC to perform exfiltration test. He continued discussing how 36 could be integrity tested, and requested that testing be done prior to any sampling. L. Martin would not commit; indicated that she would not **stall E/A&H** fieldwork for the testing.
- 1440 Discussion of new approaches to PSC 36 ensued.
- 1500 M. Hartnett discussed party responsibility for integrity testing the sewer line.
- 1510 L. Martin Site 38 and a portion of the line; Site 30 and a portion of the line. All remaining portions **will** become Category 8.
- 1520 EPA Counsel: Stated that the appropriate work plans will have to **be** amended to include the portions of site 36. L. ~~Martin~~ stated that the SAPs will be amended; M. Hartnett pointed out that there **is** no time frame for amendment reviews in the FFA.
- 1530 M. Hartnett requested that for tomorrow's discussion that L. Martin give some indication of effects these amendments/reviews will have on the schedule.
- 1630 Meeting adjourned.

**EPA MEETING/DISPUTE RESOLUTION (DR)
FEBRUARY 4, 1993**

0920 Meeting begins. EPA counsel **begins** discussion of Meeting Agenda, Item 1.

I. Discussion of p. **54 & 55** of FFA which describes Dispute Resolution process.

Consensus: NAVY has no problem with 30 days for informal Dispute Resolution from initiation of process - **informal** can go to formal at end of 30 days.

II. EPA **maintains** scribers error in FFA; Baseline **Risk** Assessment (BRA) should be a primary document, preliminary **risk** assessment **report** should be a **secondary** document. L. **Martin** says that **BRA** is listed in 93 SMP as a secondary document and therefore has no enforceable schedule. EPA wants to change FFA language. L. Martin says she will have to confer with James Malone.

- L. Martin also requested that definition of "days" in FFA be changed to calendar days **from** business days.
- EPA counsel requested written approval from **all** parties for the FFA changes.

m. Discussion of III:

- e EPA agrees in principle that Phase **II** data *can* be used to generate an SI or RI report. EPA's desires: **1)** an enforceable schedule, and **2)** concurrence with **SI**, if they can get the report review, EPA wants language in SMP to give enforceable dates.
- EPA/NAVY proposes to submit the **SI** at the due date of the BRA. **EPA's** review period is **2 weeks**. If EPA **does** not concur, **NAVY will** submit the RI by draft final due date.
- e EPA wants to review the fact that the BRA comes **before** the RI (in SMP). Indicated that the order needs to be reversed.

IV. Resolved yesterday - **NAVY** needs to provide new site strategy and date forecasts.

v. **SMP '93** *can* be revised via a letter **from** the NAVY.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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ATLANTA, GEORGIA 30365

INFORMAL DISPUTE RESOLUTION AGENDA
February 3 - 4, 1993
U. S. EPA

- I. The Dispute Resolution Process
 - (a) EPA's perspective
 - (b) Navy's perspective
- II. Baseline Risk Assessment/Risk Assessment Report/Preliminary Risk Assessment.
 - (a) Navy FFA's in Florida
 - (b) Primary Document
 - (c) Deadlines
- 111. Sites 12, 13, 14, and 24
- IV. Site 36
- V. SMP FY'93
- VI. Other Issues
- VII. Agreements

AGENDA

1. Site 36 History - E/A&H
2. Current screening data
3. Current individual site data available
4. E/A&H Plan of Action

Recommendation: Stepped Approach

Step 1: Study Areas of highest contamination first, meanwhile continue to study individual sites.

Step 2: Assess IWSL integrity noting areas of current "in-place" abandonment.

Step 3: Expand study to all areas of IWSL with objective of determining areas to be remediated.

U.S. EPA Region IV
 NAS Pensacola RPM Meeting
 February 3, 1993

Name	Position	Affiliation	Phone #
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