

## PENSACOLA PARTNERING TEAM MEETING MINUTES

<b>DATE:</b>	<b>Jan 8-9, 2002</b>
<b>TEAM LEADER:</b>	<b>Gena Townsend</b>
<b>SCRIBE:</b>	<b>Barbara Albrecht</b>
<b>GATE KEEPER/TIME KEEPER:</b>	<b>Greg Wilfley</b>
<b>PROCESS FACILITATOR:</b>	<b>Gus Campana</b>

### ATTENDEES:

#### Team Members:

Allison Harris – EnSafe Inc.  
 Brian Caldwell – EnSafe Inc.  
 Terry Hansen – TTNUS  
 Bill Hill – SouthDiv  
 Ron Joyner – NAS Pensacola  
 Gena Townsend – USEPA  
 Tracie Vaught – FDEP  
 Greg Wilfley – CH2MHill

#### Support Members:

Barbara Albrecht – Site 2/41 Support  
 Robbie Darby – SouthDiv  
 Tom Dillon – NOAA  
 Paul Stoddard – Tier II Link

## 1. Check-In

The meeting began at 8:00 AM each day. Every one is doing fine. The ground rules and processes were reviewed. L. Wellman was unable to attend due to schedule conflicts.

## 2. Meeting Discussion Items

The following items were reviewed as priority discussion topics for the given day during the meeting:

Topics	January 8	January 9
Tier II Update	x	
Site 2 Review	x	
NASP 5 Year Review	x	
Station Update	x	
Site 40 review		x
Wetland 64 Review		x
Site 41 Review		x
OU-13 Review		x
OU-11 Review		x

Topics	January 8	January 9
Site 15 Review		x
Site 43 Review		x
Site 1 Review		x

### 3. Tier II Update

P. Stoddard discussed several Tier II issues with the team. First, he related how the RCRA issue was broached to the Tier II Team during the November, 2001 meeting, whereby things such as environmental indicators, human exposure issues, control of plumes, etc., and factors related to these issues were explained. A means needs to be developed for reporting to Congress the status and progress being made at RCRA sites. For example, by 2005, 70% of RCRA sites need to meet the requirements for human health risk. The Navy expects to find out where it stands on each site, and the issues pertaining to compliance.

P. Stoddard said the issue of the requirements of a ROD versus land use control is a national debate that goes beyond Tier II. The State of Florida would like to see land use be a part of the ROD; if this is adopted, decisions can't be made until the debate is settled. EPA would like to ensure ROD enforceability; the test will be the Langley ROD.

P. Stoddard said Tier II would like to help develop schedules for the NAS Pensacola sites.

P. Stoddard said the golf course at the former NAS Cecil Field has become a transfer issue. Former pesticide use on the parcel is the problem. Under CERCLA, former pesticide application is interpreted as a release; while under FIFRA, such is not considered a release. The question is, if the parcel is transferred to the city and later developed into residential housing, which law applies?

P. Stoddard indicated other Partnering Teams are utilizing video conferencing in lieu of having face-to-face meetings. This reduces the cost of having meetings and allows GIS to be used for presenting real-time information on sites.

P. Stoddard informed the Team that NAS Key West and NAS Mayport will be transitioned without EPA representation, since these bases are losing their EPA RPM. Florida can request EPA assistance as necessary in dealing with these bases. Tier 1 has sent the ROD and decision documents for these bases up the chain for review.

P. Stoddard reminded the Team that it is important that the Tier 1 team keep the partnering spirit alive. Tier II has the perception that Tier 1 is struggling. What is standing in the way of progress at NAS Pensacola? G. Townsend interjected that the base has issues without clear-cut answers; the Team doesn't even know what endpoints are supposed to be used, and therefore must chart a path. G. Townsend indicated the easy sites at NAS Pensacola are completed; now

the Team is dealing with issues such as wetlands, sediments, surface waters (ecological issues—with ecological experts not always available to the Team), where there is a lack of guidance pertaining to endpoints for sites. The baseline has been a “moving target.”

Until there is guidance, the Team won't have much structure upon which to base decisions. It was said there seems to be a lack of focus, with too many things going on at once (the Team seems to be going in circles—stuck in the “Do Loop”), instead of focusing on a single project and seeing it through to completion. Many of these sites overlap and cannot be resolved until all data and fact finding issues are addressed. This extends time on decision making, which consumes resources allocated to “wrap-up” decisions for sites.

OU-2 is an example, with initial sampling completed in 1993, a lot of data is available; yet that group of sites is far from a decision that all parties can accept. A lot of time is spent challenging the system instead of making risk-based decisions that support forward movement. Plus, many sites at NAS Pensacola are related and intertwined, which creates a snowball effect when it comes to decision making (i.e., decisions for related sites are so intertwined that a lack of a decision for one site holds up all of the others).

In addition, extended regulator review times for site documents reflect how much work is on each reviewer's plate, which slows resolving issues and moving sites through the process.

There is also a new process for EPA reviews of sediment sites, whereby all decisions must be submitted by the EPA Regions to Headquarters for review. This process will add another step to be overcome.

P. Stoddard asked if the Team is adequately prioritizing what it needs to accomplish; is there a sense of urgency to do what is needed? It was said that progress was slipping on items of importance (some deadlines set by the Navy have already been “blown”), and that NAS Pensacola is dealing with more difficult issues than the other bases. T. Vaught asked what were the grounds for the Tier II perception? A Harris and G. Townsend reviewed the history of NAS Pensacola and pointed out that seven RODs have been signed in six years; progress is being made. R. Darby reminded the Team that funding is difficult to obtain if schedules are not met.

#### **4. Site 2 Review**

A sticking point in the recently published Site 2 RI Addendum is the use of normalized toxicity data, with which T. Dillon and L. Wellman disagreed. T. Dillon also took issue with how species diversity was studied at the site; for instance, in 1996, species diversity samples were collected during January, and thereby missed the March recruitment period for benthic organisms. In the RI Addendum, the new (March 2000) species diversity samples should have been compared to the reference stations instead of the 1996 samples (T. Dillon asked that the report acknowledge the seasonal effect if this comparison is to be made). T. Dillon also said a

biased comparison was made for sediments, with the highest of the 1993 and 1996 data compared to the mean 2000 data (Note: the Site 2 RI Addendum explains how the 1993 and 1996 samples were discrete samples, where the 2000 samples were composited samples; therefore, the highest discrete results from the earlier samples within each decision unit were compared to the 2000 composited sample results—not “mean” results). G. Townsend reminded the Team that the 1997 FFS for Site 2 included an option for monitoring. L. Wellman’s written comments said that Site 2 can’t show there is an unacceptable risk then and recommend no action for the site; monitoring may be required down the road. G. Townsend agreed the RI cannot simply say the site should be given NFA status.

L. Wellman’s comments also said to explain how toxicity is decreasing over time in a narrative fashion, and relate this to the temporal/transitory affects of sediment chemistry on species diversity. L. Wellman asked that we explain and discuss surface and subsurface sediment results and add a narrative about the comparison of the 1996 and 2000 sediment chemistry results. T. Dillon asked for clarification on feeding during the 10-day solid phase test *Leptocheirus plumulosus* toxicity test, and further explanation of control sediments and how they relate to batch sediment tests.

Discussion was held concerning revamping the recently published RI Addendum. Data from subsurface sediment samples collected in March 2000 will be included. Present the limited subsurface contamination from a “as bad as it gets” standpoint, or show that subsurface constituents are not migrating to the surface interval. More focus should be given to the submerged seawall, and the sampling stations adjacent to this seawall (CD-23 and EF-45); with a close comparison made between the surface and subsurface sediment intervals at these locations.

It was also discussed that it may be worthwhile to focus on Site 2 as a whole instead of one decision unit at a time. For example, discuss whether the trend for cadmium at the whole site is increasing or decreasing between the 1996 and 2000 sampling events. This may require discussing means, maximums, and total numbers of hits; discussing a sum HQ effect for different constituent groups. Perhaps we should do some hypothesis testing using temporal data.

Action Item: T. Dillon and L. Wellman need to review the Site 2 RI Addendum and provide comments.

## **5. 5-year Review**

In accordance with Navy policy for operable units with RODs that leave contaminants in place, 5-year reviews are conducted, per the RI/FS process. Based on the OU-10 remedial action, the 5-year review for this site will be due during February of 2003. B. Hill will award TTNUS this work as soon as funds become available. B. Hill asked how EPA will concur with 5-year reviews. EPA will send written concurrences.

There is a need to check the status of the Land Use Control Implementation Plans (LUCIPs) for OUs 01, 10 and 15. B. Hill and G. Townsend reminded everyone that there is a need to complete the documentation (showing the site boundary and groundwater use restrictions) for these LUCIPs.

Action Item: R. Joyner is going to check the status of the LUCIPs for OUs 01, 10 and 15 and report this to EPA and FDEP.

## **6. Station Update**

R. Joyner gave an update on things happening at NAS Pensacola. Building 782, the old Steam Generating Plant that was built in 1955, is closing. The base is also trying to find a location for a new fire station. There has been a problem with archeological finds during MWR's recent renovation of the A.C. Read Golf Course. Three large Indian burial grounds were unearthed; however, no Tribes have claimed the remains which were found (several are trying to claim them). Renovation of the general area of the golf course has been postponed while the issue over Indian remains is resolved.

## **7. Site 40 Review**

The recently published Site 40 Mercury Sampling Report was discussed in detail. G. Townsend also presented L. Wellman's draft written comments on this report. T. Dillon wants us to use the NOEL and LOEL numbers mentioned in his written comments on the Site 40 Sampling Report, instead of the NOED adopted from the Site 40 RI Report. T. Dillon indicated using the NOEL/LOEL won't change the conclusions, but will better support them. The two stations that fall outside (216 and 247) will have low HQs which can be documented with a good narrative. T. Dillon and L. Wellman disagree that a site foraging factor (SFF) is applicable to Site 40. L. Wellman commented that the Site doesn't need a SFF. He also thinks we should show the low HQs at the site and then explain them with a well-written narrative. G. Townsend also wants to remove reference to SFFs at the site. A. Harris said the SFFs still support a very conservative estimate. R. Darby wants to keep the SFFs and explain them a little more thoroughly. L. Wellman feels we should conclude the report by discussing the uncertainties pertaining to site risk. Explain how we have reduced the uncertainty in the Evans and Engel Model by using actual forage fish tissue data in place of estimated tissue concentrations. Explain the difference between the size of Bayou Grande compared to the size of Site 40. B. Hill would like to keep the atmospheric mercury discussion in the document, as this shows there is a contributing factor other than the Navy for the site area. Some felt that the atmospheric mercury discussion is not germane to the document because it does not pertain to the Evans and Engel model. T. Vaught wanted to talk to J. Fugitt before making a decision on the site.

Action Items: G. Townsend will talk to L. Wellman a little more about Site 40. P. Hardy will incorporate T. Dillon's comments into the Site 40 Sampling Mercury Sampling Report.

## 8. Wetland 64 Review

T. Dillon believes we can finish the site for mercury the same way as suggested for Site 40. However, we are "back in the same boat" for other contaminants at the site. We have unacceptable risk for other constituents at the site (i.e., pesticides and PCBs). Both T. Dillon and L. Wellman can't turn away from unacceptable risk at the site. Similar to Sites 2 and 40, we should use good narratives to make our points about the site, then the risks that are there will not be unacceptable. For instance, G. Townsend pointed out that OU-2 groundwater contamination is not suspected to be increasing; we therefore should base our conclusions on facts concerning whether groundwater leaching from OU-2 is or is not affecting Wetland 64. We should also examine whether upstream surface water inputs from Wetlands 5A/B and 6 are affecting Wetland 64. T. Dillon said there is a disconnect between the different studies performed at the site. We should address the relationship between the different sampling events and how they are intertwined. Point out all potential unacceptable risks, then show how they are decreasing overall. Show the decreasing trends; i.e., average the cadmium hits from each event overall and see how the trend compares to the appropriate benchmarks. A HQ is just a threshold. We should develop a technique that best presents the overall trend at the wetland. T. Dillon said we can likely close the door on mercury contamination at Wetland 64 (we answered the question asked in the tech memo), but not for other contaminants found at the site. NFA therefore does not apply to Wetland 64. The only way we can recommend NFA is to show no unacceptable risk; to do this we need to show no input. We should likely look at potential inputs to see if they still apply to the wetland. It was suggested that perhaps bioassay tests could be conducted during the remedial design phase after the Site 41 ROD is signed.

## 9. Site 41 Review

It was discussed how Site 41 needs to be addressed based on a memo drafted after the field trip several team members took to NAS Pensacola in April of 2001. Wetland 64 holds the key to all of the other wetlands. After the COPCs are refined for Wetland 64, this wetland can be used as a template for the other Site 41 wetlands. T. Dillon mentioned that the COPCs should be tracked and analyzed by a table; A. Harris interjected that the data are already presented from different angles in several tables. T. Dillon said such a table would allow the wetlands to be on an equal footing; but A. Harris said they already are considered equally. It is quite apparent that Site 41 needs further consideration by the Team. B. Hill will schedule an outline for the Interim ROD after the February meeting.

If any further sampling is done at Site 41, the Site 2 DQO process should be applied. B. Hill mentioned that application of the Draft Navy Sediments Policy can support the elimination of many of the wetland problems at Site 41. He also mentioned that the Team was going to produce an Interim ROD for the site.

B. Caldwell discussed doing SPLP sampling at the OU2 sites to determine the probability of constituents leaching to groundwater and then being transported to adjacent Site 41 wetlands.

B. Caldwell wants to develop site-specific SPLP numbers for Site 41. B. Caldwell also spoke of using "spiked" SPLP samples, since problems with the procedure have been related to bulk samples having no contaminants due to the heterogeneity of the soil. G. Townsend recommends not doing it this way since it looks more like a research project; SPLP would be okay if done without spiking the samples.

Action Item: B. Caldwell will write a technical memorandum explaining the SPLP methods he wants to use at the OU-2 sites adjacent to Site 41 wetlands.

## **10. OU-13 Review**

There is a problem because the area of concern at Site 24 sits within the grounds of the Barrancas Cemetery, in an area where the cemetery expects to expand. The assessment and FFS/FFS Addendum for OU-13 are now completed. An Interim Removal (IR) Plan needs to be developed, and the Proposed Plan and ROD modified to reflect the new changes. More soil is going to be removed under current plans, with Site 8 now added in. The September, 2001 FFS Addendum addresses the additional soil to be removed. We should go ahead and do the IR separately, and document the removal action in the ROD. EPA wants to continue with the process at OU-13; the ROD is scheduled for signature by December of 2002.

## **11. OU-11 Review**

It seems as though most comments for the site have been addressed. The FFS is being finalized. The data are showing a reduction in constituents. The RI Addendum 3 identified management decisions, answered questions, and provided supporting documentation. Lead and organics in groundwater at the site are being addressed; the RI Addendums contain the pieces for the whole picture. It was decided earlier that SPLP analyses were not required at the site since there is no residual source impacting groundwater.

There was discussion concerning how Site 38 might be impacting Site 2. Additional downgradient wells will be installed at the Building 604 Study Area of Site 38 to ensure that TCE and other VOCs are not migrating where they might be transported via groundwater discharge to Site 2. A question was asked whether the Site 2 report might be folded together with Site 38? Are the elevated total PAHs in Site 2 sediments related to what was found at Site 38? How can we make an adequate decision if we don't adequately know what is happening at the site?. T. Vaught would like to see new figures in color showing vertical delineation of the VOC contamination at the site. It was mentioned that shallow wells are screened at 5 to 15 feet below land surface (bls), while intermediate wells are about 40 feet deep.

Action Items: A. Harris will tie Site 2 into the OU-11 RI report by completing an RI Addendum. T. Vaught will provide formal comments for OU-11.

## **12. Site 15 Review**

G. Wilfley said that the removal action for the site is scheduled for April of 2002. A problem is deciding on what to do with two large trees (an oak and a palm tree) at the site.

## **13. Site 43 Review**

G. Wilfley reviewed the site. Iron in groundwater is a problem at the site; potentially caused by buried metal debris. Surface soil will be removed to two feet, with subsequently exposed subsurface metal debris removed. The site will then be backfilled. Trees will be left in place. The site won't go to a ROD (the site is a screening site). The decision document for the site will incorporate a LUCIP (subsurface soil below the two-foot layer to be removed) for groundwater. A question was asked if the Navy can avoid a LUCIP, since the backfill material will be a low-permeability material? It was mentioned that the Navy may need to go to a RI/FS for the site since a LUCIP is being considered for Site 43. The draft final removal plan will be published soon and comments can be made at that time.

## **14. Site 1 Review**

T. Hanson said that another monitoring round has been completed at the site and a quarterly report will be written once the data are available.

## **15. Group Expectations For T. Vaught**

The Team welcomed T. Vaught to the meeting, and outlined expectations for her as the new member as she represents the interests of the FDEP:

- Assist the Team in meeting its goals (suggested by B. Albrecht).
- Help the Team beat schedules (suggested by A. Harris).
- Help explain positions (suggested by B. Hill).
- Use honest communication (suggested by B. Caldwell).
- Let the Team know your needs (suggested by R. Joyner).
- Be open to accept new ideas (suggested by T. Hanson).
- Be honest about any restraints put on you by your agency (suggested by G. Wilfley).
- Get involved with the sites and open about communicating information (suggested by G. Wilfley).
- Don't hesitate to ask questions (suggested by B. Hill).
- Participate in table-top reviews (suggested by B. Caldwell).
- Become familiar with your role and responsibilities and keep the principals of partnering in mind (suggested by R. Darby).

## 16. Review of Action Items

Action Item	Responsible Party	Status	Due Date	Action To Be Taken
0105-A2	A. Harris/P. Hardy	Pending		Find out which Wetlands can be separated from the Site 41 RI into an IROD. Still looking at possibilities.
0105-A4	B. Hill	Pending		Develop proposed schedule for IROD.
0105-A5	L. Wellman	Complete		Check with B. Lewis concerning the Site 2 samples to see if there is a sample which could be used for TOC determination. No sample available; told to use 1996 TOC data.
0108-A1	B. Albrecht	Pending		Review appropriate techniques for collecting surface water samples from very shallow water bodies.
0108-A2	B. Albrecht	Complete		Finalize Site 2 Addendum.
0108-A3	Phil	Pending		Refine Site 41 matrix incorporating items presented during 08/01 meeting.
0108-A4	B. Caldwell	Complete		Incorporate regulator comments into the Site 38 Addendum 2.
0108-A5	G. Townsend	Complete		Finish USEPA comments on OU-2 FS.
0108-A6	B. Caldwell	Pending		Compare FDEP 62-777 CTLs to federal criteria, note differences.
0110-A1	T. Dillon and L. Wellman	Complete		Review Wetland 64 report and provide informal comments.
0110-A2	CH2MHill	Complete		Submit draft technical memorandum for Site 15 interim removal.
0110-A3	G. Townsend and J. Fugitt	Pending	11/16	Provide comments on draft Site 15 technical memorandum.
0110-A3	CH2MHill	Pending		Make a recommendation for Site 43 as to whether the site should undergo a soil removal or be capped.
0110-A4	T. Dillon and L. Wellman	Complete	11/16	Review Site 40 report and provide informal comments.
0110-A5	B. Caldwell	Pending	11/30	Write SOW for soil removal at OU-13.
0110-A6	A. Harris	Pending		Submit Site 38 Final RI Addendum containing comment responses.
0201-A1	T. Dillon and L. Wellman	Pending	2/22	Review Site 2 RI Addendum and provide comments.
0201-A2	R. Joyner	Pending	2/26	Check the status of the LUCIPs for OUs 01, 10 and 15.
0201-A3	G. Townsend	Pending		Discuss Site 40 Mercury Sampling Report with L. Wellman.
0201-A4	P. Hardy	Pending	2/26	Incorporate T. Dillon's comments into the Site 40 Mercury Sampling Report.
0201-A5	B. Caldwell	Pending	2/26	Write tech memo explaining the SPLP method he wants to use at OU-2 sites adjacent Site 41 wetlands.
0201-A6	R. Darby	Pending		Obtain execution plan for OU-13 interim removals.
0201-A7	A. Harris	Pending		Compile OU-11 RI Addendum that ties Site 2 to OU-11.
0201-A8	T. Vaught	Pending		Provide formal comments for OU-11.

## 17. Funding Review

*Site 1.* Long Term Operation (LTO) funding for 4 years.

*Site 15.* LTO funding for 1 year.

*Site 8 & 24 (OU-13).* LTO funding for 1 year.

*Site 43.* LTO funding for 1 year.

*Site 44.* Funded under CLEAN.

Site 2. LTO funding for 1 year.

## 18. Proposed Agenda for February 2002 Tier 1 Meeting

**Next Meeting:** February 26 - 27, 2002 at EnSafe's Pensacola, Florida Office..  
The meeting will be held from 8:00 am - 5:00 PM each day. A RAB Meeting will also be held.

**Leader:** G. Wilfley

**Scribe:** B. Albrecht/P. Hardy

**Time Keeper:** Brian Caldwell

### Next Meeting Agenda:

Description	Presenter	Time	Category/Expectation
<i>February 26-27, 2002</i>			
Check-In	G. Wilfley	1 hour	How is everybody doing?
Training	G. Campana	2 hours	Learning active listening.
Site 41	A. Harris	4 hours	Present Site 41 matrix.
OU-2	A. Harris/B. Caldwell	4 hours	Develop sampling strategy.
OU-13 update	B. Hill/B. Caldwell	0.25 hour	Status.
Site 43 update	G. Wilfley/T. Hanson	0.25 hour	Status.
CH2MHill/TTNUS update	G. Wilfley/T. Hanson	1.5 hours	Site update.
Facility update	R. Joyner	0.25 hour	Update on currents at NAS Pensacola.
Tier II update	P. Stoddard	1 hour	Latest Tier II activities/information/Tier II deliverable goals..
SPLP briefing	B. Caldwell	1 hour	Explain rationale for proposed SPLP sampling at OU-2/Site 41.
Pre-Post RAB	G. Wilfley/B. Hill	0.5 hour	Tell what happened at RAB meeting.
Check-Out	G. Wilfley	1 hour	Tie things up.
Lunch	Team	2 hours	Refresh.
Breaks	Team	40 min.	Relax.

## 19. Parking Lot

Item No.	Parking Lot Issue
9903-A13	B. Hill will submit a letter to EPA and State requesting that OU-10 be handled under RCRA authority.
9802-A14	B. Caldwell to follow-up on the list of wells to be kept for future modeling.
9806-A44	Review Tier II deliverable packages (rev. 9) for corrections and respond to B. Hill.
9811-M03	Bring MBTI materials to all meetings.
0003-A12	T. Hanson will be copied on all correspondence henceforth for the AR.
NA	The following is the proposed bi-monthly meeting schedule through August 2002: February 26 - 27, 2002 — Pensacola, FL (EnSafe's office; a RAB meeting will also be held) April 24 - 25, 2002 — Tallahassee, FL (TTNUS's office) June 26 - 27, 2002 — (EnSafe's office; a RAB meeting will also be held) August 27 - 28, 2002 — Knoxville, TN ( EnSafe's office)

## 20. Perform +/- Criteria

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Introduction to T. Vaught as new FDEP representative. Tier II update/assessment. B. Albrecht's Site 2 update. G. Campana's training. Progress made (i.e., less conflict; discussions went better). G. Townsend's leadership of meeting. Decision on Site 40. Facilities/Lunch.	A few sidebars took place. Not having Joe Fugitt present. Team needs to do a better job capturing parking lot/action items.