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NAS WHITING FIELD  
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MINUTES FROM DOCUMENT REVIEW MEETING TO DISCUSS RESPONSE TO  
COMMENTS ON 10 NOVEMBER 1993 NAS WHITING FIELD  
11/10/1993  
NAS WHITING FIELD

**MEETING MINUTES  
RESPONSE TO COMMENTS/DOCUMENT REVIEW MEETING  
NOVEMBER 10, 1993  
NAVAL AIR STATION WHITING FIELD**

On November 10, 1993, representatives of the Southern Division Naval Facilities Engineering Command (SDIV), Florida Department of Environmental Protection (FDEP), Tallahassee Office, United States Environmental Protection Agency (USEPA) Region IV, and ABB Environmental Services, Inc. (ABB-ES) met at the offices of USEPA in Atlanta, Georgia, to discuss the U.S. Navy responses to regulator's comments on the following documents pertaining to Naval Air Station (NAS) Whiting Field, in Milton, Florida:

- *Remedial Investigation/Feasibility Study Phase IIA, Technical Memorandum No. 1, Surface Water and Sediment Assessment, NAS Whiting Field, Milton Florida, July, 1993*
- *Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida, July, 1993*

The following personnel were in attendance:

<b>NAME</b>	<b>Phone #s</b>	<b>AFFILIATION</b>
Mr. Jeff Adams, EIC	(813) 743-0341	SDIV, Charleston, S.C.
Mr. Robert H. Pope	(404) 347-3016	USEPA, Atlanta, GA
Mr. Eric S. Nuzie	(904) 488-0190	FDEP, Tallahassee, FL
Mr. David Clowes	(904) 488-0190	FDEP, Tallahassee, FL
Mr. Eric Blomberg	(904) 656-1293	ABB-ES, Tallahassee, FL
Mr. Rao Angara	(904) 656-1293	ABB-ES, Tallahassee, FL
Mr. John A. Bleiler	(617) 245-6606	ABB-ES, Wakefield, MA

The meeting commenced at 10:30 with an introduction of all participants. The meeting agenda included review and discussion of the Navy responses to regulatory (USEPA and FDEP) comments on the two above-referenced reports prepared by ABB-ES for NAS Whiting Field.

Prior to the review of the comments and responses, Mr. Angara distributed a document containing all regulatory comments and responses (including proposed responses) on the above-referenced documents. This document was comprised of nine chapters: each chapter contained a different set of regulatory comments followed by either existing or proposed Navy responses to comments.

The following meeting minutes summarize the review of comments and responses, in the chronological order in which they were discussed:

1. **Response to USEPA Comments of September 23, 1993 on the RI Phase IIA Technical Memorandum No. 1, Surface Water and Sediment Assessment**

**Cover Letter Comments**

The cover letter comment regarding the need for future Draft, Draft Final, and Final documents (rather than Draft Final and Final) was tabled until the afternoon session. USEPA raised concerns in the September 23, 1993 cover letter regarding the following phrase in Technical Memorandum No. 1: "no significant environmental contamination attributable to NAS Whiting Field appears to be present in Clear Creek surface waters and sediments". In particular, Mr. Pope found the use of the words "significant" and "attributable" to be beyond the scope of the technical memorandum (i.e., these terms represent an interpretation of data, rather than a statement of fact). The Navy agreed to strike these two words from the sentence in question and to limit future technical memoranda to statements of facts, rather than interpretations in data. In addition, the Navy agreed to better differentiate between Clear Creek and the Clear Creek Floodplain, thereby minimizing confusion regarding these two different study areas.

Mr. Pope raised concerns regarding the Contract Required Detection Limits (CRDLs) in surface water. In particular, Mr. Pope was concerned that CRDLs for several inorganic analytes exceed chronic federal Ambient Water Quality Criteria (AWQC). Rather than immediately pursuing costly Special Analytical Services (SAS) methods with lower CRDLs, ~~the Navy proposed collecting one surface water sample from Clear Creek.~~ This sample would be collected from approximately 1000 to 2000 feet upstream of the furthest existing upstream sample to see if contaminants (inorganic analytes) are coming from an upstream source or may be naturally occurring in surface water. ~~The sample will be analyzed for TAL inorganics.~~ If the sample is not contaminated, samples from the locations where ARARs were exceeded will be collected and analyzed (using special analyses) for inorganic analytes with CRDLs above the applicable ARARs. If special analyses are required, Mr. Pope will contact USEPA ESD to request low detection analytical methods that can be used to lower the CRDL below the applicable ARARs.

Comment 4: Mr. Pope and Mr. Clowes indicated that some confusion exists in the Technical Memorandum regarding the distinctions between contaminants in Clear Creek and the Clear Creek Floodplain. In addition, Mr. Pope and Mr. Clowes stated that more explanation and detail was required regarding environmental and QC samples. The Navy agreed to more clearly distinguish, both in text and in tables, between Clear Creek and the Clear Creek Floodplain.

#### **Comments on the Technical Memorandum One of Phase IIA**

Comment 1: Mr. Pope indicated that several ARARs for surface water have been updated since Technical Memorandum No. 1 was completed. These include Safe Drinking Water Act (SDWA) and AWQC values for lindane, fluoride, aluminum, lead, and manganese. The Navy agreed that any future deliverables would include the updated values for these analytes, and that the values used in any future risk assessments would be the most current values.

#### **Specific Comment on the Clear Creek Floodplain Investigation Report**

Comment 1: Mr. Pope inquired about the statement regarding the determination that contaminants in the Clear Creek Floodplain may be laboratory contaminants. In particular, he expressed concerns that acetone and methyl ethyl ketone (both common laboratory contaminants) may also have been disposed of at the site. Mr. Bleiler and Mr. Blomberg stated that the ecological and public health risk assessments, through the use of RAGs guidance, would include a separate evaluation of site versus laboratory contamination. All parties agreed that this evaluation would address any relevant concerns.

Mr. Pope proposed that the meeting adjourn for lunch at approximately 11:45. The meeting continued after lunch with discussion of FDEP comments on the NAS Whiting Field documents.

#### **2. Response to FDEP Comments of September 1, 1993 on the RI Phase IIA Technical Memorandum No. 1, Surface Water and Sediment Assessment**

Mr. Clowes stated that many of the FDEP comments were adequately addressed through the morning discussion of the USEPA comments and the Navy's responses. Mr. Clowes only addressed those responses that remained unclear or were found to be unacceptable to FDEP. All other responses were agreed to by FDEP.

**Comment 4:** Mr. Clowes indicated that Figure 2-1 in the Technical Memorandum had some discrepancies regarding sample station locations. The Navy agreed to revise and include this figure in the responses, with both sample identification numbers and station identification numbers.

**3. Response to FDEP Comments of August 24, 1993 on the Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida**

Prior to initiating discussions on specific FDEP comments, Mr. Pope opened a discussion regarding the status of the Clear Creek Investigation relative to the identification of the source(s). Mr. Blomberg stated that the source of contamination in the Clear Creek Floodplain is currently unknown. However, he indicated that three possible sources exist: (1) the concrete-lined drainage ditch leading from the NAS Whiting Field southern airfield to the Clear Creek Floodplain; (2) contaminated groundwater discharging to the surface in the Clear Creek Floodplain; and, (3) a buried source (i.e. drums with leaking contamination). The Navy stated that only deep groundwater contamination is currently known to exist at Site 16, the RI site closest to the Clear Creek Floodplain, and that it is unlikely that this groundwater discharges to the surface at the Clear Creek Floodplain. Mr. Adams stated that additional groundwater monitoring is currently underway at Site 16 and that the results of this monitoring program may provide additional information on the source of contamination at the Clear Creek Floodplain.

Mr. Clowes inquired that FDEP wanted clarification whether any private drinking water wells currently exist in the vicinity of the Clear Creek Floodplain site. Mr. Blomberg responded that to the best of his knowledge all residents within one mile of the Clear Creek Floodplain site are on the Point Baker municipal water system.

Mr. Nuzie and Mr. Clowes stated that many of the FDEP comments were adequately addressed through the day's discussion of the USEPA comments and the Navy's responses. Mr. Nuzie and Mr. Clowes only addressed those responses that remained unclear or were found to be unacceptable to FDEP. All other responses were agreed to by FDEP.

**Comment 1:** FDEP indicated that geophysical sampling of the area to the northwest of the southern beaver pond should occur. Mr. Blomberg stated that this region is covered with 4 to 6 feet of standing water throughout the year, a condition that prohibits magnetometer and other geophysical investigations. FDEP indicated that this is an acceptable rationale for not conducting further geophysical investigations in this region; however, he stated and the Navy agreed that a better explanation regarding the lack of geophysical data in this region should be included in all future reports.

Mr. Bleiler indicated that it is incorrect to continue to refer to this area as a beaver pond. No signs of any recent beaver activity have been observed at the Clear Creek Floodplain site. All parties agreed that future maps will contain better habitat classification nomenclature.

Comment 2: Mr. Clowes indicated that additional sampling should occur in the area to the northwest of the southern beaver pond. The Navy agreed that future investigations in this area will include sediment sampling and screening for Total Petroleum Hydrocarbons (TPH), as well as confirmatory TPH laboratory analysis.

Comment 3: Mr. Clowes stated that the FDEP believes that surface water and sediment samples should be taken from the area immediately downgradient of the concrete drainage ditch discharge. Mr. Blomberg and Mr. Bleiler stated that, based on their familiarity with the Clear Creek Floodplain site, contaminants are unlikely to adsorb to the coarse sandy soils and sediments in this region. The presence of contamination in the floodplain appears to be well correlated with the presence of silty organic floodplain sediments, which generally do not occur at the drainage ditch outfall. However, in response to FDEP and USEPA concerns regarding the region directly downgradient of the concrete drainage ditch, the Navy agreed to collect two sediment samples (one from the drainage ditch outfall sediments and one from the bank of the unnamed tributary near the outfall) from this area and screen them for TPHs. In addition, the Navy agreed to collect one surface water sample from further downstream (above the sediments with the highest TPH contamination) for full scan Contract Laboratory Procedure (CLP) analysis.

Comment 4: Mr. Clowes expressed concerns regarding the presence of contaminants in the Clear Creek Floodplain which may be laboratory contaminants. In particular, he said that acetone and methyl ethyl ketone (both common laboratory contaminants) may actually be present in the site's sediments. The Navy agreed to re-sample locations that had high concentrations of acetone and methyl ethyl ketone, as well as any location that had detected concentrations of dichloroethylene.

Comment 5: Mr. Clowes indicated that a figure is required illustrating the relationship of the Clear Creek Floodplain site to previous surface water and sediment stations with the highest levels of contamination detected in the RI studies. The Navy agreed to include the sampling locations on a figure.

Mr. Pope concluded this section of the meeting with a brief summary of the status of NAS Whiting Field as a future National Priorities List (NPL) site. Mr. Pope indicated that the next opportunity for NPL listing would occur in the spring of 1994, and that the USEPA would like to commence work on the Federal Facilities Agreement (FFA) for NAS Whiting Field prior to NPL listing. Mr. Pope also requested a project managers meeting to take place in February 1994 to discuss the status of the Whiting Field RI/FS. All parties agreed a meeting should take place.

**4. Response to FDEP Comments of September 16, 1993 on the Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida**

Mr. Clowes stated that many of the FDEP comments were adequately addressed through the earlier discussion of the USEPA comments and the Navy's responses. Mr. Clowes only addressed those responses that remained unclear or were found to be unacceptable to FDEP. All other responses were agreed to by FDEP.

Comment 2: Mr. Clowes indicated that a larger map of the Clear Creek Floodplain site would be useful. This map should show groundwater flow direction in the vicinity of the site. The Navy said this map will include the jurisdictional wetlands boundary, as determined in an October, 1993 field investigation.

Comment 2 (cont): Because the levels of contamination in the Clear Creek Floodplain may be harmful to aquatic life and may accumulate in food chains, the FDEP indicated that a biological evaluation is needed at the site. Mr. Bleiler recommended that a tiered approach be used to evaluate risks and impacts to biota from the site. It was agreed that a future ecological risk assessment Work Plan would detail the tiered approach, and that a tiered approach would likely involve comparison of analytical chemical data to existing sediment quality standards, floral and faunal community diversity studies, *in situ* or laboratory bioassays, or bioaccumulation studies. The Navy suggested that it would be more economical to conduct certain studies (e.g., bioassay studies) in conjunction with gathering additional analytical chemistry data on the floodplain sediments.

**5. Response to USEPA Comments of September 30, 1993 on the Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida**

Mr. Pope stated that many of the USEPA comments on the Clear Creek Floodplain site were adequately addressed through the earlier discussion of the USEPA and FDEP comments and the Navy's responses. Mr. Pope only addressed those responses that remained unclear or were found to be unacceptable to USEPA. All other responses were agreed to by USEPA.

### **General Comments**

Comment 1: Mr. Pope indicated that he felt the goals of the Clear Creek Floodplain Investigation were not achieved. As stated in the report, the project goals were "to identify and characterize the nature and extent of contamination in the Clear Creek floodplain sediments in the vicinity of Site 16 and also attempt to determine the source of the contamination". Mr. Pope indicated that he believed that the Navy should refrain from making broad statements in future reports. Mr. Adams stated that the goals, as stated, were accurate and that the Navy is attempting to meet these goals. He indicated that even if the Navy is unable to achieve these objectives, the goals are valid. All parties agreed that future documents should contain a statement indicating the status of the on-going investigation relative to the stated goals and objectives.

### **Specific Comments**

Comment 2: Mr. Pope indicated that the ecological characterization is inadequate for assessment of environmental impacts at the site. The Navy agreed and stated that the ecological characterization will be further detailed in the ecological risk assessment for this site. All parties agreed that a comprehensive ecological characterization is beyond the existing scope of the floodplain investigation report, which is intended to be a data summary report, not an ecological risk assessment.

Comment 3: Mr. Pope recommended and all parties agreed that the scale on Figure 2-2 needed to be changed to reflect the easting and northing scale. A revised figure will be included in the responses.

Comment 6: Mr. Pope objected to the use of the term "estimated background concentrations" in the report. He recommended that the Navy should use site-specific background data only. Mr. Blomberg stated that regional background concentrations are no longer used as a standard of comparison.

Comment 13: Mr. Pope requested and the Navy agreed to submit EM-31 profile data in electronic format with the responses.

Comment 16: Mr. Pope requested and the Navy agreed to add the background sediment sample data to Table 4-2 of the report. A revised Table 4-2 will be included in the responses.

Following the review of the USEPA comments on the Clear Creek Floodplain Investigation, discussion was initiated regarding the USEPA's perceived need for future Draft, Draft Final, and Final documents (rather than the existing two-stage system, which employs Draft Final and Final). Mr. Adams stated that the Navy would prefer to continue with the two-stage approach (Draft Final and Final) and that the three-stage approach is both costly and time-consuming. All parties agreed that the two stage approach would be continued on a trial basis, with the following modifications: (1) the Navy will provide the regulators with a Draft document for conceptual review at the time the draft document is submitted to the Navy; (2) the Navy would respond to any regulatory concerns (including concerns voiced informally through telephone consultation) regarding the Draft document and would incorporate these responses into the Final Draft; (3) the Navy would submit the Final Draft to the regulators for review and comment; (4) the Navy addresses the comments and incorporates the responses into the actual pages of the document and submits the changed pages along with the responses to the regulators; (5) the regulators agree to the changes or a discussion between the Navy and the regulators takes place to come to an agreement for each response in question; and, (6) once all comments have been addressed to the satisfaction of the regulators, the document will go Final. Mr. Adams agreed to prepare a letter from SDIV to the USEPA and FDEP summarizing the proposed approach. In order to finalize Technical Memorandum No. 1, it was agreed that the Navy will submit a comment response package summarizing the regulatory comments and Navy responses.

Prior to adjourning the NAS Whiting Field regulatory meeting several concerns raised by USEPA during a May 20-21 site inspection were addressed. Mr. Blomberg indicated that concrete curbs are currently being scheduled to be installed around those monitoring wells that were installed without bumper posts at the corners of the concrete pad. All curbing is expected to be installed by the end of 1993. In addition, Mr. Blomberg indicated that weep holes have been placed in the surface casings of all monitoring wells at NAS Whiting Field. Mr. Angara stated that two barrels removed from the Clear Creek Floodplain have been disposed of by the installation; according to Mr. Angara, ABB-ES was not involved in the disposal action. Mr. Angara also stated that NAS Whiting Field, and not ABB-ES, was involved in an underground storage tank removal in the vicinity of Site 7. Mr. Adams stated that he would forward any relevant data collected during tank removal to USEPA and FDEP.

The NAS Whiting Field portion of the meeting was adjourned at 15:00 hours. Mr. Clowes and Mr. Nuzie excused themselves and the remaining personnel discussed the Outlying Field (OLF) Barin remedial investigation, in Foley, Alabama.

Mr. Angara inquired about the status of the regulatory review of the OLF Barin Technical Memoranda. Mr. Pope stated that USEPA superiors have instructed him not to review the OLF Barin document, as they are considered a low priority relative to the NAS Whiting Field RI/FS. Since the Navy is the lead agency, Mr. Pope suggested that the Navy and ABB-ES complete the Draft Final RI/FS for OLF Barin and submit it on schedule. Since USEPA will be unable to review this Draft Final document, no Final version will be prepared by the Navy.

The meeting was adjourned at 15:35 hours.

**MEETING MINUTES FOR THE  
NAS WHITING FIELD  
REMEDIAL PROJECT MANAGERS MEETING  
May 24, 1994**

**Attendees:** Jeff Adams - SouthDiv  
Ray Butka - SouthDiv  
Robert Pope - USEPA, Region IV  
Bruce Arnett - FDEP  
John Mitchell - FDEP  
Jim Holland - NAS Whiting Field, PWD  
Robin Futch - ABB-ES  
Gerry Walker - ABB-ES  
Sal Consalvi - ABB-ES  
Gopi Kanchibhatla - ABB-ES

Afternoon Session only  
John Kaiser - ABB-ES  
Jim Williams - ABB-ES

**Meeting Called to Order: 10:00 a.m.**

Gerry Walker (ABB-ES) gave a brief introduction and reviewed the meeting agenda (attached). All attendees were introduced prior to the meeting. Mr. Walker then initiated discussion on the first agenda item "proposed operable unit (OU) breakdown and state of the Site Management Plan"(SMP). A memorandum was distributed that listed the preliminary OUs proposed for the facility. Following a group discussion with primary input from Robert Pope (USEPA), a total of six OUs were defined. The attached memorandum provides a description of the OUs and explains the rationale for the site groupings.

Mr. Pope then led the discussion on the SMP. He provided two separate examples of SMPs. One that he preferred (Defense Distribution Depot - Memphis, Tennessee) and a second SMP (Revised 1994 Site Management Plan of the Installation Restoration Program for the Naval Air Station Pensacola in Pensacola, Florida, April 27, 1994) that was cited as a lengthy document that he would prefer to avoid. Mr. Pope indicated that the SMP establishes milestones and schedules for the RI process and would be updated annually. In addition, Robert is planning that the Federal Facilities Agreement (FFA) deliverable schedule to be tied to the SMP, therefore both schedules would be updated annually and allow greater flexibility in the RI/FS program. Robert also indicated that he is continuing to work on the FFA for NAS Whiting Field.

Mr. Walker provided a facility-wide groundwater flow map and indicated that groundwater is generally flowing in a south to southeasterly direction.

Mr. Walker then outlined the plans for the remainder of the meeting. Two Whiting Field team members Sal Consalvi and Gopi Kanchibhatla were scheduled to summarize the recently compiled draft Phase II-A data, Mr. Walker would then summarize identified data gaps and solicit a group discussion on the identified data gaps. Complete summary tables of the data were supplied to the RPMs at the beginning of the meeting.

A summary overview of the discussions conducted at this meeting is presented below.

**Background Sample Discussion**

Surface Soil Samples - Overall it was concluded that sufficient background surface soil samples were collected. At present no data gaps were identified.

Surface Water/Sediment Samples - It was agreed that one additional upgradient sample will be collected northwest of the facility, at the confluence of Clear Creek and an unnamed tributary. This concurs with background surface water and sediment sampling discussions at the previous RPM meeting (November 10, 1994).

Groundwater Samples - An adequate number of samples and locations have been completed, however, elevated inorganic concentrations have been detected in background and site-specific samples. To further clarify these results it was proposed that additional sampling be completed with analysis for filtered and unfiltered inorganic parameters. This data will be used in the risk assessment and will provide additional uncertainty data for inorganic contaminants exceeding risk-based concentrations. As a cost saving measure, only a representative portion of the monitoring wells at the facility will be re-sampled. However, the sampling results will be extrapolated throughout the facility and to all previous sampling results.

Subsurface Soil Samples - No background subsurface soil samples have been collected at the facility. It was generally agreed that given the depth to groundwater and variability of subsurface soils, no subsurface sampling for background characterization is warranted.

### **Proposed No Further Action (NFA) Site Discussion - Sites 1, 2, 9, 12, and 31**

The sample results were summarized for each of the sites. A summary of the site-specific data gap discussions is as follows:

- Site 1 - Additional surface soil samples are required to support the risk assessment. The ABB-ES risk assessor will obtain input from risk assessment reviewers prior to determination of the exact number of samples.
- Site 2 - One additional downgradient monitoring well is required to support a NFA decision. The groundwater sample will be analyzed for total and dissolved inorganic parameters in addition to the Target Compound List (TCL) and Target Analyte List (TAL) parameters.
- Site 9 - No data gaps were identified and consequently no additional investigation is planned. It is possible that the exact site location has not have been accurately determined, however additional aerial photo searches and file searches are not warranted.
- Site 12 - One additional downgradient monitoring well is required to support an NFA decision. The groundwater sample will be analyzed for total and dissolved inorganic parameters.
- Site 31 - Robert Pope requested that the individual Site 31 disposal areas be redesignated to distinguish between the different areas. ABB-ES concurred with the recommendation and will define specific designations in the upcoming Technical Memoranda.

Additional surface soil samples may be required from each of the six disposal areas to support the risk assessment. The ABB-ES risk assessor will obtain input from risk assessment reviewers prior to determination of the exact number of samples.

Additional soil or sediment samples may be required from the drainage swale located down-gradient of the disposal area containing soil samples WHF-31-SL-12 through 15. In addition, upgradient and downgradient monitoring wells are needed at this disposal area due to the elevated inorganic concentrations detected. Groundwater samples collected in association with the site will be analyzed for both filtered and unfiltered inorganic parameters in addition to the TAL and TCL analysis.

The meeting was stopped for a lunch break.

### **Operable Unit "Landfills" Discussion - Sites 10, 11, 13, 14, 15, and 16**

The sample results were summarized for each of the individual sites. A summary of the site-specific data gap discussions is as follows:

Site 10 - Additional surface soil samples may be required to support the risk assessment.

Additional groundwater samples will be collected and analyzed for filtered and unfiltered inorganic parameters.

Site 11 - Additional surface soil samples may be required to support the risk assessment.

Additional groundwater samples will be collected and analyzed for filtered and unfiltered inorganic parameters.

Site 13 - One additional downgradient monitoring well, located south-southeast of the site, will be installed and sampled to further define the extent of contamination.

Additional surface soil samples may be required to support the risk assessment.

Additional groundwater samples will be collected and analyzed for filtered and unfiltered inorganic parameters.

Site 14 - Additional surface soil samples may be required to support the risk assessment.

Additional groundwater samples will be collected and analyzed for filtered and unfiltered inorganic parameters.

Site 15 - Additional surface soil samples may be required to support the risk assessment.

Additional groundwater samples will be collected and analyzed for filtered and unfiltered inorganic parameters.

Site 16 - Additional upgradient monitoring wells will be installed to further define the source of organic contamination detected in the present upgradient monitoring wells. In addition, downgradient monitoring wells will also be installed to determine if contaminants are migrating off facility.

Additional surface soil samples may be collected to support the risk assessment evaluation.

A representative number of the monitoring wells will be sampled and analyzed for filtered and unfiltered inorganic parameters.

### **Operable Unit "Crash Crew Training Area" Discussion - Sites 17 and 18**

The sample results were summarized for each of the sites. A summary of the site specific data gap discussions is as follows:

Site 17 - Vertical extent of soil contamination has been determined and sample results have characterized contaminants within the individual pits. The current data appears to be sufficient to initiate the Feasibility Study (FS).

Site 18 - Vertical extent of contamination has been determined and sample results have characterized contaminants within the individual pits. Current data appears to be sufficient for the FS. No data gaps have been identified.

Bruce Arnett (FDEP) suggested that additional source area monitoring wells may be required in the immediate test pit area for both sites 17 and 18. ABB-ES and SouthDiv took the suggestion under advisement.

### Industrial Area Discussion

Although the discussion proceeded through the three separate areas of the industrial area (North Field Area - Sites 3, 4, and 32; Midfield Area - Sites 5, 6, and 33; and South Field Area - Sites 7, 8, 29, and 30) the identified data gaps for each of the three areas were the same and are presented as such below.

- Groundwater contamination has not been adequately characterized. Data gaps include defining the lateral and vertical extent of organic contamination in groundwater. Additional investigation will focus on the use of a groundwater screening methodology to collect in-situ groundwater samples to be analyzed for organic compounds on a field portable Gas Chromatograph (GC). The field screening data will be used to strategically locate monitoring wells.

The vertical and lateral extent of subsurface soil contamination has not been adequately defined. Additional sample collection and field portable GC screening for organic contamination is proposed to be conducted in conjunction with soil borings required for the groundwater investigation.

Another potential data gap is the lack of characterization and definition of specific source area(s).

Mr. Pope inquired about the Underground Storage Tank (UST) removal that was conducted at the South Field Fuel Farm. He was particularly interested in the depth of the excavation and the amount of soil that was removed. Mr. Jim Holland (NAS Whiting Field - PWD) indicated that the soil removed during the tank excavation was backfilled into the excavation and topped off with clean soil to bring the soil up to grade.

The group also discussed Site 8, and it was determined that because the UST program has determined that the site is a NFA site, no additional work will be conducted at the site.

### Future Program Support Decision for Sites 4 and 7 (UST Sites 1467 and 1466 respectively)

Previous discussions between ABB-ES and SouthDiv had indicated that based on TCE contamination in groundwater samples, the investigation and remediation of groundwater for Sites 4 and 7 should be transferred to the IR program. However, a final decision concerning the investigation and remediation of the surface and subsurface soil had not been made.

Mr. John Kaiser (ABB-ES) and Mr. Jim Williams (ABB-ES) presented soil gas headspace data collected during the UST program investigations at the sites. ABB-ES and SOUTHDIV were of the opinion that the soil investigation at Site 7 (UST Site 1466) should remain in the UST program because of the large separation distance between identified contamination in the shallow subsurface soils and deeper soils immediately above the water table. However at Site 4 (UST Site 1467), because elevated OVA readings were reported continuously from the land surface to the water table, the investigation and remediation of contaminated soils at this site should be transferred to the IR program.

USEPA and FDEP representatives indicated they would prefer that the soils investigation along with the groundwater investigation for both sites should be transferred to the IR program due to the potential for mixed wastes. John Kaiser indicated that he would contact Luis Vazquez, SOUTHDIV's UST EIC, to convey the RPM's comments and to facilitate transfer of the site to the IR program.

The meeting was concluded at approximately 4:30 pm.

**MEETING MINUTES  
APRIL 26, 1995 RPM MEETING  
NAS WHITING FIELD**

Attendees

Jim Cason	FDEP
Craig Benedickt	USEPA
Jeff Adams	SDIV
Ray Butka	SDIV
Jim Holland	WHF
Robin Futch	ABB-ES
Gerry Walker	ABB-ES
Terry Hansen	ABB-ES

The evening prior to this RPM meeting the initial RAB set up meeting was held. Eleven interested community members came to the RAB meeting.

Items discussed at the RPM meeting concerned Tech Memo 7 and the upcoming field program.

Specific Discussion Items

**BACKGROUND SAMPLES**

Additional surface soil samples will be collected from recently burned areas (not sites) to compare to sample data from sites that have been burned.

\* Three additional surface soil samples will be collected.

**SURFACE SOIL SAMPLE INTERVAL**

ABB proposes using the interval of 0 to 1 foot bla.

Jim Cason will check on FDEP's position.

**BACKGROUND SUBSURFACE SOIL SAMPLES**

None have been collected to date and none are proposed in Phase IIB.

Craig Benedickt is to check with EPA risk folks to determine their position (quantity, depth, analysis, etc.).

**GROUNDWATER SAMPLING**

Filtered versus unfiltered sampling for metals - what to do?

Craig suggested a memo for Bill Bokey at EPA Athens detailing procedure and previous problems. Gerry Walker is to follow up on this issue.

**NFA SAMPLING**

The sites that are potentially NFAs were discussed and possible data gaps identified.

The idea of grouping Sites 1 & 2 into a separate OU was discussed. This would allow a PRE to be done versus a full Risk Assessment and hopefully expedite getting an IROD.

**DATA GAPS IDENTIFIED**

Site 1            Downgradient monitoring well, MW, is needed.

Site 2            Two downgradient MWs along southern boundary are needed.

- Site 9 Additional data needs to be collected before determining that the site is ready for NFA. The site may be somewhere else - Site 10? or 11? A soil gas survey will be conducted at Site 9 during the upcoming Phase IIB field work. b
- Site 12 One downgradient MW is needed and soil samples from subsurface.
- Site 21 Sludges/metals are concern; will need to evaluate sampling plan to ensure that what is needed to determine NFA is possible.

#### COLD WATER CREEK

Surface water and sediment samples should be collected from the drainage ditches where they enter tributaries and before they converge with the creek. This will be done during the Phase IIB field work.

#### ACTION ITEMS

1. Surface soils - Background depth 0' - 1' vs. 0' - 2.  
Jim Cason to check w/ FDEP for their position.
2. Subsurface soils - Background How many? What depth?  
Craig Benedickt to check with Risk Group at EPA on this.
3. Filtered vs. unfiltered groundwater samples.  
Gerry to send memo to Jeff for proposal to EPA for methodology approval.
4. NFA - What is required for NFA if groundwater is not a pathway?  
Jim Cason will check with FDEP and Craig Benedickt will check with EPA.
5. Everybody think about the possibility of an OU for Sites 1 & 2 to be able to get IROD.
6. Cold Water Creek drainage ditches are to be sampled prior to converging with the creek.
7. What is required to get IRODs?  
Terry Hansen and Gerry Walcott will check for data requirements.  
Craig Benedickt will check with EPA.
8. A soil gas survey will be done at Site 9 to try and define it.
9. The availability of SCAPs for site use (9 & 10) will be checked by Jeff Adams.
10. A response to the ASTDR letter/report will be coordinated by Jeff Adams.