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NAB LITTLE CREEK
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MEETING MINUTES FROM INSTALLATION RESTORATION PARTNERING TEAM MEETING
DATED 10 APRIL 2000 NAB LITTLE CREEK VA
4/10/2000
CH2MHILL

Naval Amphibious Base Little Creek IR Partnering Group Meeting Minutes:

Partnering Meeting – April 10 - 11, 2000

ATTENDEES: Bob Schirmer/LANTDIV
Robert Weld/VDEQ (conference
call Day 2)
Donna Caldwell/CH2M HILL
Bruce Beach/ USEPA
Wandy Browne/Facilitator

Scott MacEwen/CH2M HILL
Will Bullard/Tier II

COPIES:

FROM: Donna Caldwell/CH2M HILL/VBO

DATE: April 10-11 2000

LOCATION

Annapolis, Maryland

MINUTES

April 10, 2000

12:00 Check In, Introductions

Review Groundrules.
Review assigned roles
Review previous meeting minutes
January Meeting Minutes accepted as edited

I. Parking Lot:

Parking Lot

- LANTDIV position on outfalls/water body sampling
- ARAR applicability for 2 ft soil cover at closed landfills prior to Soild Waste Regulations

- Discuss background stats
- Onboard review of FFA "strawman" of Site History
- Rifle Range
- Dioxin at Site 9
- SWMU 2 discuss results

Meeting minutes approved as edited; **consensus** of team

II. ECO Update

Bruce and Bill Kappleman (via conference call) presented an update of the ECO Subgroup conference call. Discussed EPA comments to Tech Memos and Draft Step 1 & 2 ERA, the subgroup plans to set up meeting to further discuss the comments. No consensus was reached on comments on the screening process or what should be looked at in the Baseline ERA. Subgroup thought they had agreed on many issues, but several comments on the technical memos and screening documents did not reflect these decisions. A meeting is set for next week, April 21, to work out a process to avoid surprises. Progress with the ERA is to back up and agree on a formal process of how the group functions and how to resolve issues on ERA, then they will address the ERA process and methodologies. The upcoming meeting will address these issues. The new BTAG coordinator, Bruce Pluta, will be present at the next few meetings. Discussed the potential for partnering of the subgroup. Bruce Beach noted face-to-face meeting should help communication and that formal partnering should not be necessary. Bob noted Tier I would rely on the subgroup, and asked if Tier I should take a more active role. Bill noted the Tier I link seems to work well enough. Bob asked how this affects Site 9 & 10 Step 3 submittal and ROD schedule. Bill responded that based on BTAG comments this schedule is delayed to an unknown timeframe until these fundamental issues are resolved. At the April 21 meeting the group will address schedule of submittals. If comments can be resolved, then a target for final submittal of the screening ERA report is 18 days after, or the group will provide Tier I the proposed new dates for deliverables. Bob noted it is important that at the meeting it is stressed that these issues are bringing the IR program to a halt. It was asked if Bruce Pluta was aware of these ERA implications to the program and schedules.

Follow up discussion after the call with Bill. **Action Bruce-** provide by email an update of ECO Subgroup meeting. Request Subgroup focus efforts on comments relevant to Sites 9 & 10.

III. SASR Review

Scott addressed the SASR and schedules were updated. **Action Donna** – prepare deliverable of background statistics and statistical approach for interim review by EPA to be submitted one week before the next meeting (5/10/00). For the FFA **Action Donna** email SMP to Bruce.

IV. Tier II Update

Will Bullard provided update of Yorktown land use controls, noting that it has not been finalized yet, but is close. Tech papers on the web site as mentioned at previous meeting. ROD language meeting with Attorneys is happening this week. This meeting is to provide Tier I appropriate language for helping prepare RODs to go through the system easier.

V. Budget Update

Bob presented budget update. OHM proposal for SWMU 8 was 268K, which will put us under the allocated funds. May be some funding left to consider ORC testing and also to consider actions at Site 8 (construction landfill).

VI. FFA Sorting

Review of Sites

SWMU 23- Rifle range, discussed status since it is an active site. Bruce suggests it may be important to identify potential environmental problems around the site. Site status is to remain TBD. **Action Bob**, BMP for Ranges

IR Site 6 (SWMU 117/4)- Discussed if Appendix A or B site, if MCL is exceeded then an action needs to be taken (even if only monitoring). Bruce suggests Appendix A status, which would require a risk evaluation.

IR Site 9 & 10- 2 foot soil cover was confirmed, Robert will be emailed a table of the boring log information.

IR Site 8- Bob addressed soil cover over the site and the implications with the wildlife refuge.

Day 2 April 11, 2000

Check In

Review / Revise Agenda

VII. SMP Review

Scott summarized the Draft SMP and the team discussed review comments. DEQ has no comments on the SMP. Bruce commented that the plan should include a discussion of how the Appendix B sites will be addressed and note that the Partnering Team will address several sites each year for a desktop review. Put this discussion in Section 4.0 Schedules. Bruce noted the document was well written and organized. Revise by changed pages, cover page from draft, and include signature page. Send final to Stephanie McManus. Bob needs 5 copies of complete new documents, and 3 replacement page sets.

Discussed IR Site 16, - Reviewed close out report and pre-excavation site investigation report. In the close out report, the post-excavated area was sampled with four composite samples comprised of 9 sub-samples. Results of PCBs were less than 10 ppm; one composite sample was 5 ppm and one was 7 ppm, which is still greater than the 1 ppm referenced by Peter Knight in his ERA comments. Bruce suggested we make the argument using information from these reports that there is little or no risk to vicinity surface water and how surface water would likely pond near the pole not flow off site, and that the concentrations outside the excavation are between 1 and 3 ppm. Bruce also suggested doing a HHRA to establish risk for the site to avoid any land use restrictions. Need to

discuss this with Robert. **Action Bruce-** discuss this issue with Alvero. **Action Scott –** discuss this issue with Bill

Site 9 & 10 LTM Report comments from Burce. Bruce noted site seasonal variation is indicated with zinc. Overall the trend is decreasing. The recommendation is for annual sampling and therefore Bruce suggests sampling in May when zinc levels appear to be the highest seasonally, however since there are only two rounds left the team may consider going ahead and doing May and December. **Consensus** to eliminate the December sampling event (Roberts consensus via conference call). Bob asked if these data warrant another round of background sampling. Bruce noted not necessarily. Bruce also noted that well LS10-MW04 showed some metals not typically detected. It was noted that a truck had hit the well. **Consensus** (Roberts consensus via conference call) to drop LS10-MW04 from the monitoring program. **Consensus** to discontinue sampling for VOCs and wet chemistry parameters (Roberts consensus via conference call). Need to further discuss (April 20 conference call) possibly discontinued sampling for pesticides pending a review of round 7 & 8 results. SVOCs should continue to be sampled. For Site 9, the wells located near UST were noted to be high in barium.

VIII. SWMU 2, 7, & 8 SI Work Plan

Discussed review of the Draft Work Plan for SWMUs 2, 7,& 8. Discussed Roberts comments. Discussed SWMU 2 as an active site. Do we need to look at SWMU 2 under CERCLA? Arsenic is only a problem in one soil sample (> residential RBC). Discussed putting the site status as Appendix B pending and to remove SWMU 2 from the work plan. Also change the Site Management Plan to note the removal of SWMU 2 from Appendix A to Appendix B.

With respect to Robert's comment for 20% analysis of full suite, we will analyze a minimum of 4 samples for full suite.

Robert on conference call- address issues pending his approval

- March meeting minutes approval: consensus for approval
- Site 7 delay the fifth round: consensus for approval
- FFA language – use of VDEQ or Commonwealth of Virginia– Carryover, Robert will look through Air Force Agreement and will discuss with Bruce areas where VDEQ should be changed to Commonwealth of VA
- PCBs at Site 16, would DEQ consider a 10^{-5} risk with no institutional controls. **Action Robert** to discuss this with DEQ toxicologist.
- Remove LS10MW04 from the monitoring program, consensus to remove well from program
- Site 9 & 10 sampling for SVOCs should be continued. Pesticides sampled in rounds 7 & 8 and if no detects, remove pesticides from monitoring program after 2 rounds. Robert will consider and report back this afternoon. **Consensus** to drop VOCs from program. **Consensus** to drop wet chemistry parameters. Also only one more round of sampling remaining as outlined in the original five-year monitoring plan, will be in May and not

in December. Any further monitoring will be outlined in the ROD. **Consensus** to only sample in May 00 and accept recommendation for only one round.

- SWMU 2, to Appendix B site, discuss sampling results in next meeting. As part of removal of Steam Plant to build new plant, construction will include activities for clean up of the site. **Consensus** to place site in Appendix B and discuss results at the next meeting.
- Notified Robert of ECO Subgroup issues and comments.

Review comments to work plan:

Bruce- comment to include sediment sampling adjacent to SWMU 7 & 8. Bruce is concerned with the absence of sediment samples in the work plan. Bob noted historical dredged sediment data is available and is indicated to be high in metals. Questioned if sampling sediments at SWMU 7 would the sediment data still necessarily be linked to SWMU 7. **Action Bob-** investigate if historical dredge data is available in Desert Cove adjacent to SWMU 7.

Another comment from Bruce was if the well screen is in the middle of the aquifer then there is possibility that LNAPL or DNAPL that could be missed. Bruce prefers to screen across the top of the aquifer with a 15-foot screen and using low flow with intake at the middle of the screened interval.

Replace water level measurement well LS10-MW4 with LS10-MW05 since well integrity of LS10-MW4 has been compromised.

Bruce would like to see sampling of the background well LBG-MW08 and LS10-MW05 (already being samples for Site 10). Will sample LBG-MW08 for full suite.

SWMU 8 Bruce recommended a sediment sample at the outfall from the pipe at SWMU 8. **Action Bruce-** Set up conference call April 20 to finalize sediment sampling issue in the work plan.

Bob discussed March 15 initial visual delineation at SWMU 8 and addressed the use of XRF for screening for metals during excavation. Robert noted that was fine but would still need quantitative confirmatory sampling following completion of the removal action. Bob discussed results of TCLP sampling. ROICC office thinks the ABM if non-hazardous could be disposed of wherever they chose. Robert noted DEQ does not have clean fill requirements but solid waste regulations do address special waste. If soil exceed SSLs the DEQ requires risk assessment prior to disposal. **Action Robert-** check on DEQ requirements for soil as fill material.

IX. Partnering Roles of Team Members

Presented in Partnering Deliverable

X. Goal Update

FY00

1. Submit Draft RODs for Sites 9 & 10 (9/00) (Draft ROD does not include legal review)
 - 12/99 - schedule reviewed during meeting - on schedule;
 - 2/1/00- work funded
 - 3/00- additional sampling required, on schedule pending results
 - 4/00- behind schedule by 20 days for final ROD by 9/30/00; schedule may slip further due to ecological issues and dioxin**

2. Final Baseline Human Health Risk Assessment for Sites 9 & 10 (5/00)
 - 12/99 – on schedule pending funding ;
 - 2/1/00- work funded
 - 3/00- on schedule pending results of site 9 and 10 sampling
 - 4/00- behind schedule awaiting EPA review comments of interim submittal II**

3. Final Background Study (9/00)
 - 12/99 – on schedule;
 - 2/00- sampling completed Jan 2000.
 - 3/00- on schedule, may slip due to laboratory deliverable delay
 - 4/00- on schedule**

4. Complete Final RI for Site 11 (draft), Site 12 (final), & Site 13 (final) (9/00)
 - 12/99 - on schedule, may slip pending re-prioritization of sites.
 - 2/1/00
 - Draft Site 11 SRI (6/00):
 - 3/00 on schedule
 - 4/00 on schedule**
 - Final Site 11 SRI (9/00):
 - 3/00 on schedule
 - 4/00 on schedule**
 - Draft Site 12 SRI (1/00):
 - submitted 1/00,**

 - Final Site 12 SRI (5/00):
 - 3/00 on schedule
 - 4/00 on schedule**

5. Draft FFA (12/99) Submit Final FFA (9/00)
 - 12/99 – on schedule;
 - 2/1/00-
 - Draft FFA (12/99) –
 - 1/00 slips to 2/00
 - 3/00 catagorized all sites for FFA draft slip to 3/15/00
 - 4/00 on schedule**

 - Final FFA (9/00)-

on schedule
4/00 on schedule

6. Partnering Deliverables (4/00)
 - 12/99 – on schedule, completed roles and responsibilities by entity;
 - 2/1/00- Conflict resolution completed, two partnering deliverable remains
 - 3/00- On schedule member entrance/exit procedures completed
 - 4/00- Completed**

7. Complete Site Management Plan (4/00)
 - 12/99 – on schedule, reviewed during 12/99 meeting;
 - 2/1/00-On board review of draft SMP scheduled for 2/29/00
 - 3/00- On board review, draft submittal slip to 3/15, completed
 - 4/00- on schedule**

8. Scoping of FY 01 Work (8/00)
 - 12/99 – on schedule;
 - 2/1/00- on schedule
 - 3/00 on schedule
 - 4/00 on schedule**

9. Set up Eco Subgroup (11/99)
 - Goal Completed 10/99;**

10. Complete Ecological Risk Assessment through Step 3 for Sites 9, 10, 11, 12, & 13 (5/00)
 - 12/99 – on schedule;
 - 2/1/00- Work funded, Eco-sub group conference call scheduled for 2/2/00 to finalize screening values
 - 3/00 – on schedule, steps 1 & 2 drafts submitted 1/28
 - 4/00- behind schedule, ERA problems with comments; meeting to resolve issues 4/21; goal cannot be met**

11. Complete Ecological Risk Assessment through Step 3 for Sites 5, 7, 8, & SWMU 3 (9/00)
 - 12/99 – on schedule;
 - 2/1/00- Work funded, Eco-sub group conference call scheduled for 2/2/00 to finalize screening values
 - 3/00 – on schedule, steps 1 & 2 drafts submitted 1/28
 - 4/00- behind schedule, ERA problems with Step 1 & 2 comments; meeting to resolve issues 4/21; goal cannot be met**

12. Finalize Master Project Plans (3/00)
 - 12/99 – on schedule, comments due December 31, 1999
 - 2/1/00 – VDEQ submitted comments; EPA comments due 2/00
 - 3/00 - behind schedule
 - 4/00 did not meet goal, to be completed by 5/00**

13. Complete Draft Site Investigation for SWMUs 7, 8, & 2 (9/00)

12/99 – on schedule, may slip due to re-prioritization of sites

2/1/00-

SWMU 2, 7 & 8 Project Plans (5/14/00): on schedule

SWMU 2, 7 & 8 Final Report (9/29/00): on schedule

Note: SWMU2- Possible problems with ERN funding of an active site- will discuss at next mtg. SWMU 8- disposal/initial characterization samples taken 1/00. Bob will get ready to obligate \$\$ to OHM for SWMU 8, based on sample results.

3/00- work plan submitted,

4/00- on board review of comments; on schedule

14. Evaluate and prioritize site rankings by a risk using Navy Model (2/00)

12/99 - on schedule, NORM model submitted to Team 11/99

2/1/00 – Site ranking list reviewed 1/00. **Goal completed**

ADDENDUM: APRIL 20, 2000 CONFERENCE CALL MINUTES

The following minutes summarize the Partnering Team's April 20 conference call.

SWMU 7

Discussed sediment sampling as part of the Work Plan for SWMU 7 and 8. Consensus to collect five sediment samples at SWMU 7 adjacent to the bulkheads along Desert Cove. Two samples near CB125, one in the corner by slip 52, one by slip 49/50, and one north of slip 44. Samples will be analyzed for total metals and SVOCs. Storm sewers will be identified on the map for SWMU 7 to ensure sediment sampling locations avoid the outfalls.

SWMU 8

Discussed sediment sampling at SWMU 8. Bruce and Robert proposed a sediment sample at the outfall of the storm drain that originates near the water tower. Navy policy on historical releases and outfall sampling was discussed. The Navy will not arbitrarily sample to locate/determine historical releases. While the Navy is responsible for addressing past environmental releases at NAB Little Creek through the IR program, the Navy cannot be held responsible for the cleanup of environmental concerns outside the boundaries of NAB Little Creek. The exception to this statement is if the contamination is a result of Navy operations, and has left Government property. The Navy will then use its CERCLA lead agency authority to investigate and remediate any contamination leaving our site. What this means to the investigation of SWMU 8 is that the Navy will investigate SWMU 8 and follow the source of contamination away from the site until no further contamination is found. We are currently sampling the ditch adjacent to SWMU 8 as part of the SI. If test results from the SI investigation show elevated levels of metals in the ditch, we will then determine the extent of contamination in the RI, by working away from the site and investigate the sediment in the storm piping. If the sediment in the storm piping is not contaminated, then the sampling investigating will stop. Unless contamination downstream (i.e. Northwest branch) can be directly tied to the Navy's IR site, we will not implement further investigation. Of concern at this site is the majority of storm water flow in this ditch originates from the city of Norfolk, before draining to the small section of the ditch that

flows through Government property. Based on previous testing, the Navy already has sediment samples in Little Creek harbor that indicates sediment is high in some metals. VDEQ and EPA expressed concern that sediments contaminated as a result of SWMU 8 may have washed through the storm piping due to past storm events and may have been re-deposited in the vicinity of the outfall area. Team consensus was not reached on the issue of downstream/gradient sampling protocol.

SWMU 2

Discuss the removal of SWMU 2 from the Work Plan since it is an active site. The site will be removed from the work plan and placed in Appendix B status for the FFA. Bob noted that when RRR data is compared to preliminary background data there does not seem to be a problem. Based on the research that Bob has conducted regarding the production of dioxin compounds associated with the steam plant, process temperatures may be within the range needed to produce dioxins, and some coals are associated with chlorinated solvents. Consensus that when sampling for dioxin at Site 9 one surface soil sample at SWMU 2 would be collected near the fly ash silo for dioxin analysis. SWMU 2 will not be investigated as part of the SI for SWMU 7 & 8.

SITE 9

Consensus to sample groundwater for dioxin in three down gradient wells: MW04, MW05, and MW06. Bruce noted ECO concerns with surface soils. Consensus that if a low lying area receiving surface runoff is apparent, a surface soil sample will be collected for dioxin analysis. May sampling for Sites 9 & 10 will only include TAL metals, pesticides, and SVOCs.

END CALL

NEXT MEETING

May 17 & 18 Chincoteague VA

Start: 8:00

End: 5:00

Guests:

Roles

Chair: Bob

Timekeeper: Bruce

Host: Robert

Recorder: Donna

Goal Keeper: Bob

Guests: Tier II Bruce Frizzel

Conference Call: May 11 Thursday 10:00

Proposed Agenda:

- Background Stats 1 hr
- SWMU 2 results RRR/dixon 1 hr
- FFA Review 1 hr
- FY 01 Scope of Work 1 hr
- Site 8 EE/CA 2' cover and \$ 1 hr
- BMP Rifle range 0.5 hr
- Partnering 1 hr(0.5 per day)
- Check in/Check out 3 hr
- ECO Update 1 hr
- PCBs Site 16 0.5 hr
- Comments on Site 12 RI 1 hr

Next meeting June 14, & 15, Philadelphia

August 1, 2 VA Beach

September 12, 13 Richmond

NEW ACTION ITEMS

- 4/00-1 Action Scott**-follow up with Tier II for pull down menu on Web page for goal updates
- 4/00-2 – Action Scott** – update Partnering Team member list on Web Site
- 4/00-3 Action Donna** – prepare deliverable of background statistics and statistical approach for interim review by EPA to be submitted one week before next meeting.
- 4/00-4 Action Donna** – Send Bruce electronic copy of Draft SMP 4/12/00
- 4/00-5 Action Bob**, BMP for Rifle Ranges
- 4/00-6 Action Bruce**- discuss Site 16 risk issue with Alvero.
- 4/00-7 Action Scott** – discuss Site 16 risk issue with Bill
- 4/00-8 Action Robert** – discuss Site 16 risk issue with Bill
- 4/00-9 Action Scott/ Ann West**- send pesticide data to Team from rounds 7 & 8 by 4/25
- 4/00-10 Bruce Robert**- look at pesticide data for Sites 9 & 10, hold conference call to discuss need to analyze for at Site 9.
- 4/00-11 Action Bob**- investigate if historical dredge data is available in Desert Cove adjacent to SWMU 7.
- 4/00-12 Action Bruce**- Set up conference call April 20 to finalize sediment sampling issue in the SWMU 7 & 8 work plan and May sampling parameters at Sites 9 & 10
- 4/00-13 Action Robert**- check on DEQ requirements for soil as fill material.

UPDATED PREVIOUS ACTION ITEMS

- 3/00-1 Action Scott** – provide Bob list of Laboratories and Data Validators
Completed
- 3/00-2 Action Scott (4/18)**- respond to EPA comments on ORC Pilot Test.
Carryover In progress on going (4/25)
- 3/00-3 Action Scott (3/7)**- send SASR out Final to team
Completed
- 3/00-4 Action Robert** – prepare text for ECO alternate screening values as a success story and goal update to Tier II.
Completed
- 3/00-5 Action Scott**- discuss with web supervisor adding Goals to web menus.
Completed, discussed with Dronfield, will add pull down menu to web, Ac

3/00-6 Action Donna – IR 16 compare AOC-B confirmation data with risk criteria,

Completed

3/00-7 Action Scott – IR 16 provide close out report- if PCB levels >1 then consider removal for a no action PRAP/ROD

Completed

3/00-8 Action Donna - SWMU Report Update to include FFA sorting

Completed FFA Carryover SWMU Report in Progress (6/15/00)

3/00-9 Action Bruce- SWMU 116- address weather SVOC analysis is needed for this site

Carryover (5/17/00)

3/00-10 Action Scott- SWMU 5- check with Dan Feinburg if GIS mapping will meet the need for recording historic building locations

Completed

3/00-11 Action Bob -SWMU 23 - check on status of rifle range, is the site active? plans for closure?

Completed, site active no plans for closure

3/00-12 Action Team- SWMU 23 team to research rifle ranges in FFAs

Carryover

3/00-13 Action Bob -SWMU 109 TBD/FoF pending - check that floor drains have been taken off line, drains in the back have been confirmed sealed. Closure of drains in front of building uncertain

Completed/Carryover, Bob was told all drains go to sanitary sewer. Bob will still inquire with another individual

3/00-14 Action Team-clarify if FFA Table should be included in the SMP.

Completed

3/00-15 Action Bob – Check status of site 7 for LTM ECO concerns,

Carryover- put on hold to clarify parameters. Bob noted recent sewer line break which released sewage into ditch west of Site 7. **Consensus** to delay fifth round of sampling at site 7 for six months to allow for revision of sampling program to address ECO concerns.

3/00-16 Action Rick/Bob- Check with Francine Blend about sanitary permit for exceedences at SWMU 2. Bob checked with John VanName, John Camberlin, and Brian Lee. At region, Francine deals with Norfolk, Wilke Din has responsibility for Little Creek. If SWMU 2 is under permit then will actions be addressed in the permit

Carryover

3/00-17 Action Bob- Check SWMU 2 status with respect to funding as an active site
Completed

3/00-18 Action Donna – test results of soil cover survey (letter report) to DEQ
Carryover

3/00-19 Action Robert- Notify Stacy of change in Partnering meeting
Completed

3/00-20 Bob- locate boring logs for golf course wells for use at Sites 9 and 10
Carryover

3/00-21 Action Donna- email updated list of member info
Completed

3/00-22 Action Scott – check on Annapolis hotel reservations
Completed

3/00-23 Action Robert/Bruce- look at SWMU 17/1 data to assess possible FoF status vs appendix B
Carryover

3/00-24 Action Bob- Contact Bruce for action for Bruce to provide comments on Master Project Plans
Completed

3/00-25 Action Team- review roles and responsibilities of team members
Completed

3/00-26 Action Bob find out about new Kelly/Rick replacement
Completed will advertise outside

1/00-6 Robert address issue of use of "Commonwealth of VA" "VDEQ" in the FFA
Carryover

1/00-9 Bruce inquire how EPA would handle an active unit (SWMU 2 fly ash unit)
Carryover (3/31), Completed

1/00-11 Bob investigate DERA funding of active sites
Carryover (3/31), completed

1/00-12 Scott talk to Doug after Tier II meets to discuss SWMU 2
Completed

12/99-14 Action Bob/Scott submit BOA to EPA and DEQ.
Completed

4/99-7 - Bruce: Try to obtain 4 copies of EPIC report for IR Group Members
Carry over in progress

5/99-18 - Bob: Check with LANTDIV regarding experience with SWMUs and outfalls and update team at September meeting
Carry-over (3/30).

Completed-Navy is not ready to sample water bodies

6/99-9 Bob - Verify floor drains at steam plant have been sealed
Carryover (3/30), Ken Clark has additional information (**in progress**) Ken has been looking Some drains found, still investigating
Completed

8/99 – 7 Bruce/Bob Review Marine Reserve Center status as part of NPL. Investigate if Site 4 can be excluded from the NPL.
Completed/carryover (3/30/ 00), yes can be taken out, **carryover Bob** to further discuss with attorneys. Bob noted all land has been transferred to Chief Mid-Atlantic Region; LANTDIV still responsible for environmental.

8/99 – 8 Bruce – Check with toxicologist on an appropriate number of samples for analysis of the full suite of compounds verses partial list for Site Investigations at SWMUs 7, 8, and 2. Can only a % of total samples get full site.
Carryover (3/30)
Completed – Site by site basis, make sure numbers are defensible