

Inter-Office Correspondence

14 October 1993

To: Distribution  
From: Laurie Huffman

Subject: Discussion Summary, IRP Program at NAS Jacksonville  
7 - 8 October 1993

The following representatives from Southern Division and ABB Environmental Services, Inc. (ABB-ES) met in Charleston, South Carolina, on 7 - 8 October 1993 to discuss current and new projects for the IRP Program at NAS Jacksonville, Florida.

Attendees: Southern Division  
Joel Murphy  
Paul Campbell  
David Driggers  
Charlie Black

ABB-ES  
Philip Georgariou  
Peter Redfern  
Laurie Huffman  
Peggy Layne  
Greg Brown

A summary of discussion items is set forth below:

1. Operable Unit #1, Feasibility Study Approach

Project management LOE will be considered as a separate portion, in terms of the Navy forming their government evaluation of the proposed FS tasks, of the POA for Modification to CTO #057. During consolidation of the Jax CTOs, all project management (including community relations support, project meetings, monthly reports) for the IRP program at NAS Jacksonville will be consolidated into one CTO.

Per J. Murphy, the LOE estimated for executing the feasibility study (FS) is excessive when compared to other estimates for comparable workload/complexity. ABB-ES should be sensitive to budgetary constraints at Southern Division. Joel is looking for a "lean and mean" approach to FS. P. Layne noted that the proposed efforts were consistent with what had been proposed, and executed, on NAS Whiting and MCLB Albany.

G. Brown recommended that ABB-ES perform the alternatives analysis, from which a limited list of remedial alternatives would be presented to the regulatory agency(ies) for review and approval. Once the regulatory agency has "bought in" to a preferred approach, ABB-ES could then proceed with completion of the FS. This approach could be contracted to ABB-ES in stages, and would

probably reduce the cost of executing the feasibility study. J. Murphy concurred in principle with this approach and will decide whether to adopt it.

## 2. Operable Unit #2 - Feasibility Study Status

Data has been received for sludge drying beds. ABB-ES is putting together the ARARs and consolidating data to describe alternatives and obtain vendor quotes.

The FFS effort is still waiting for earthworm bio-assay. This data should be available in early November. The earthworm bio-assay is necessary to further define the area of contamination and assist in the ecological impact assessment. Results can also be used to correlate field screening results (TPH) with ecological effects at other sites at NAS Jacksonville.

J. Murphy reiterated his concern for schedule. The remedial action must be on contract (RAC) by June 1994, and the procurement lead time at Southern Division is 4 - 6 months. Therefore, the feasibility study must be finished in December 1993.

P. Layne assured J. Murphy that the FFS for PSCs 2, 41 & 43 will be completed in November barring any unforeseen obstacles. The Technical Memorandum also can be finished in December, contingent upon contract award for the SOW Modification to CTO #053. The Technical Memorandum can not be started any earlier than the beginning of November, and will take 4 weeks to produce. *(Side note: Phoncon between J. Murphy and P. Georgariou on 14 October indicates that the CTO 053 modification will not be negotiated until early November. This could impact ABB-ES' ability to meet Joel's schedule.)*

J. Murphy mentioned that he will provide ABB-ES with copies of the closure permits for PSCs 41, 42, and 43.

A great deal of discussion took place concerning remedial alternatives for PSCs 3, 41 and 43. If PSCs 41 and 43 are evaluated on their own, the only economic and efficient solution would probably be to remove the soil and haul it away. However, ABB-ES cautioned that such a piecemeal approach of evaluating PSCs one by one may cost the Navy more in the long run. Contaminants at PSC 3 are anticipated to be similar to those found at PSCs 41 and 43, so the most cost-effective remedial solution for PSC 3 may be to combine the requirement with that of PSCs 41 and 43, given their similar characteristics. Because of the size of PSC 3, it may be more economic to implement an on-site remediation process, which could then be carried over to PSCs 41 and 43.

J. Murphy asked when ABB-ES could evaluate PSC 3. ABB-ES responded that such action could not be initiated until the RI field program is put on contract and the field work done. J. Murphy then asked if a limited field investigation consisting of some number of soil borings/hand augered samples would be sufficient. G. Brown suggested that if ABB-ES recommended a "dig-only" scenario at PSCs 41 and 43, with the assumption that the soil would be stockpiled at PSC 3, then ABB-ES could later execute a full RI/FS at PSC 3 to obtain the data necessary for a complete analysis. This would of course, require regulatory buy-in. P. Layne offered that the FFS for PSCs 41 and 43 would include calculations of the break-even point when the volume of material to be remediated would make on-site remediation cost effective, compared with a "dig and haul" scenario.

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J. Murphy stressed that it is imperative that the RI at PSC 3 be expedited, using a field laboratory, fast turn-around for confirmation lab data and data validation, etc. ABB-ES concurred that an as-yet-to-be-determined certain number of samples taken from PSC 3 could be analyzed on an expedited schedule (with the concomitant fast turn-around surcharge) to support calculations. ABB-ES reminded Joel that because the previously promised funding had not been provided, the field laboratory at OU-2 was being dismantled and returned to the vendors.

J. Murphy asked that the FS personnel review the RI portion of any new POA to ensure that all of the FS data requirements are adequately supported within the field program. Additionally, feasibility study personnel should review the data that is already available to ensure that no duplication of effort is proposed. Joel was assured that those review steps had already been implemented.

3. Revised Statement of Work for Modification to CTO #053

P. Redfern reviewed ABB-ES concerns about the new Statement of Work, as follows:

Para. 2.3 - inclusion of wells at Timiquana Country Club Golf Course. How many wells? J. Murphy responded that the RI/FS workplan specifies the number of wells to be installed. ABB-ES will contact Mike Planert, USGS in Tallahassee, to ensure that the quantity and location requirements are still adequate.

Para. 2.4 - ecological inventory is not specified in the SOW. ABB-ES feels that an ecological inventory should be performed and that it would be more cost effective if it is done for the entire OU #2 area (including applicable shoreline of the St. John's River), not by PSC. J. Murphy and P. Campbell concurred that an OU #2 ecological inventory should be proposed, although it may be deleted during negotiations if the cost is found to exceed that budgeted. ABB-ES POA team will confer with Norm Richardson, ABB-ES Wakefield, to review ecological assessment requirements for the St. John's River area.

ABB-ES requested that the Navy define "focused". J. Murphy responded by stating that a focused RI or focused FS relates to a specific media of concern, or to a specific Potential Source(s) of Contamination (PSC), as opposed to an entire Operable Unit.

Groundwater at PSC 42: Per J. Murphy's direction, ABB-ES should investigate groundwater contamination in vicinity of the Polishing Pond from a standpoint of how groundwater contamination would impact remediation of the soil, sludge, and surface water in the pond; however, review of remedial alternatives will not include remediation of contaminated groundwater. Groundwater contamination should be managed as an engineering problem only and should not be the focal point of the RI/FS.

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Fate and transport modelling: G. Brown asked whether a fate and transport model should be prepared at this point. P. Campbell expressed his concern that by getting into the area of fate and transport, the overall approach to this new requirement would exceed the definition for a focused RI/FS. P. Layne suggested that the fate and transport evaluation effort should look at the relationship of soil contamination and groundwater quality, not evaluating where the contaminated water goes. ABB-ES could perform a desk-top analysis and compare it to risk-based clean-up levels (to be executed under existing CTO #053 budget). This effort would reduce the uncertainty factor, and the fate and transport modelling would help determine the effectiveness/efficiency of clean-up alternatives. Additionally, because OU #2 has so far demonstrated a constant stratigraphy across the site, ABB-ES would only have to do one fate and transport model for the site. J. Murphy concurred with this approach, and requested that it be included in the POA.

ABB-ES recommended that one Technical Memorandum be prepared for PSCs 41 and 43. J. Murphy concurred, so long as the document explicitly identifies how the recommended remedial action applies to each PSC within the Technical Memorandum.

Para 2.9.1 - ABB-ES asked J. Murphy to define "full extent of contamination at PSC 42". J. Murphy responded that ABB-ES should limit its characterization to source contamination.

QA/QC requirements for analytical data: All samples shipped to an off-site laboratory for analysis will require NEESA Level C data packages. In lieu of SOW requirement that field data will be performed at a Level 2, the sentence will be re-written to state that any samples that are analyzed by a field laboratory will require Level 2 data and will require 10% of the samples analyzed be confirmed at an outside laboratory, at NEESA QA/QC Level C.

Para. 3.6 - ABB-ES asked J. Murphy to define "ARARs evaluation pertinent to data evaluation and sampling". J. Murphy agreed that this sentence should be re-written to state that data collected will be compared with ARARs.

Para 4.1 states that the Contractor will provide the Navy with a work schedule. J. Murphy agreed that the standard Primavera schedule contained in the POA and TFMR will satisfy this requirement.

Para. 4.2.1 states that a "rough" focused RI/FS report will be prepared within 90 days of notice to proceed. ABB-ES questioned this turn-around time. J. Murphy responded that a date was necessary, and that ABB-ES could suggest an alternate date for delivery based on the projected schedule in the POA.

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4. CTO #068, Certification of Closure for the Old Plating Shop

G. Brown reviewed the current status of CTO #068. Work is expected to continue through mid-November to early December timeframe. P. Georgariou stated that as long as the project is completed by early December, current funding should be adequate.

G. Brown stressed that changes to the Work Plan have been recommended by SouthDiv, directly to Ebasco, but no parallel changes have been suggested for the closure permit. As such, ABB-ES cannot certify closure in accordance with the permit, unless the permit is modified and has been approved by applicable regulatory agencies. J. Murphy acknowledged that this is an issue, and stated that he is working towards its solution. G. Brown requested that the Navy keep ABB-ES informed, since ABB-ES cannot anticipate changes or problems if we are not in the communication link.

J. Murphy stated that if ABB-ES witnesses something being done which is not in accordance with the permit, we should bring this to J. Murphy's attention. Additionally, anything ABB-ES feels is suspect from a technical perspective should also be brought to the Navy's attention.

A discussion was held regarding the disposal of the tanks, which cannot be cleaned to meet the permit requirements. A suggestion had been previously made that the tanks be treated as scrap metal. G. Brown cautioned that the acceptability of that approach was subject to some interpretation of the RCRA regulations and that up front regulatory buy-in will be necessary. Joel noted that he had a meeting scheduled with the FDEP and requested ABB-ES look into different approaches to solving this dilemma. Joel requested that the information be provided to him by 13 October if at all possible.

5. Operable Unit #3

P. Redfern gave a brief status update of work at OU #3. ABB-ES plans to identify, in the Work Plan, presumptive remedies at the site. Any funds remaining in the project will be used toward that end.

6. Floating Product at Operable Unit #1

J. Murphy stated that an RFP for a Proposed Plan and Interim Record of Decision for the floating product at OU #1 will probably be released to ABB-ES by 15 October 1993.

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7. CTO #055, Site Screening Workplans at NAS Jacksonville

J. Murphy stated that a memo has been forwarded to Southern Divisions Contracts Department requesting that ABB-ES identify what actions have occurred to date and remaining budget. Then, ABB-ES should determine which of the following items could be accomplished under the remaining budget:

- . PSC 5 Site Screening Sampling & Analysis Plan
- . PSC 5 Site Screening FW
- . Final RRDS appendices

Remedial Response Decision System: Southern Division will talk to Washington to see if a new "study effort" can be initiated. There is a great deal of pressure to complete RRDS this year. J. Murphy plans to implement RRDS in the first quarter of FY94 if concurrence from NAVFACENGCOCM can be arranged.

8. CTO Consolidation

ABB-ES recommended that the IRP program at NAS Jacksonville be consolidated into 2 CTOs, one for OU #1 plus other program-wide requirements, and one for OUs #2 and #3. Existing CTOs would be consolidated as follows:

CTO #040 - RI/FS at OU #1 and IRP Program Management at NAS Jacksonville  
Includes: CTOs #040, #055, #056, #057, #060 and #065

CTO #076 - RI/FS at Ous #2 and #3  
Includes: CTOs #053, #068, #075 and #076

ABB-ES recommended, and Southern Division concurred, that the consolidated CTOs should include master SOWs, which consolidate all existing SOWs awarded under these various projects. J. Murphy will provide disk-copies of all SOWs available at Southern Division, and ABB-ES will rearrange pertinent paragraphs to create a single, comprehensive SOW for the new CTO #040 and #076.

C. Black will coordinate with Navy Contracts to process administrative modifications consolidating the IRP program into two CTOs.

P. Georgariou and E. Wheeler will advise J. Murphy/C. Black of any accounting impact of this change.

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