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MINUTES FROM 4 APRIL 1995 BASE REALIGNMENT AND CLOSURE TEAM MEETING NTC
ORLANDO FL
4/10/1995
ABB ENVIRONMENTAL



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MEMORANDUM

To: Wayne Hansel
From: Jim Manning
Date: April 10, 1995
Subject: Minutes of BCT Meeting, April 4, 1995

The meeting started at 1330 in the BRAC Environmental Coordinator's (BEC) conference room in Building 2078. The following people attended the meeting:

LCDR Catherine Ballinger (NTC PWO)
Wayne Hansel (SouthDiv)
Greg Baker (SouthDiv)
Nancy Rodriguez (USEPA Region IV)
David Clowes (FDEP)
Rick Allen (ABB-ES, Jacksonville)
Jesse Tremaine (ABB-ES, Jacksonville)
John Kaiser (ABB-ES, Tallahassee)
Jim Manning (ABB-ES, Jacksonville)

Summary of BCT Decisions and Action Items

- David Clowes reconfirmed that FDEP requires that all human health risk assessments be compared to 1×10^{-6} for cancer risks. If remediation of the site to that level is technologically or economically impractical, then some flexibility in the form of risk management may be considered by FDEP.
- David Clowes confirmed that if all analytical results from a study area or site are below all relevant action levels, e.g., RBC, SCG, MCL, etc., then no preliminary risk evaluation is needed to release the property for transfer. He further confirmed that acceptable risks are built in to those levels.
- FDEP will require at least one monitoring well to be installed and sampled for every site being screened before the state will concur on "no further action" and release of the site for transfer.
- ABB-ES will provide a revised workplan for the additional screening work at the Herndon Annex to EPA and FDEP by Friday, April 7 for review. EPA and FDEP will provide comments to ABB-ES by Friday, April 14.
- For Study Area 3, the BCT, through the Navy, directed ABB-ES to review the sample data, insure the samples were collected using the low flow technique, resample if necessary, and validate the data. The results are to be re-presented to the BCT for their consideration.

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- There will be no BCT meeting in May; however, a special meeting will probably be scheduled in mid- to late May to discuss the preliminary findings and monitoring well placement at OU 1 and the background sampling results. The next regular BCT meeting is scheduled for 8 June.

Additional Work at the Herndon Annex

Rick Allen, ABB-ES, led the discussion on the proposed workplan for the additional screening work at the Herndon Annex. The plan calls initially for deep groundwater investigations using Cone Penetrometer Testing (CPT) along the south and west boundaries of the Annex, which is up gradient from the landfill sites and would indicate the plumes may be originating offsite. If nothing is found up gradient, then further CPT would be conducted down gradient to determine if a plume exists.

The BCT accepted the basic plan, but decided that surface soil samples should also be taken, and that they be taken using the same methodology as the surface soil samples at OU 1. David Clowes requested the analytical data on the previous deep well sampling for review (ABB-ES will provide).

The conclusion of the discussion was that the additional screening work at the Herndon Annex will include:

- hazardous study area warning signs around the landfill areas;
- up to 15 deep investigations with a cone penetrometer, with three water samples per location; and,
- one composited surface soil sample will be taken per acre, in accordance with the workplan for OU 1.

The workplan will be revised to include all points and will be distributed to EPA and FDEP for review by Friday, April 7. EPA and FDEP agreed to provide comments to ABB-ES by Friday, April 14.

Preliminary Risk Evaluations

Jesse Tremaine, ABB-ES, led the discussion on the preliminary risk evaluations (PREs) for Study Areas (SA) 3, 8, and 9. In summary, the PREs indicate unacceptable human health risks at SA 8 and 9, questionable human health risk at SA 3, and no ecological risks at any of the three SAs. The final conclusions, however, cannot be reached on risks until the results from the background sampling are available for comparison, because background concentrations may be above relevant action levels.

The PRE for SA 3 indicates a cancer risk of 7×10^{-6} which is below EPA's acceptable level of 1×10^{-4} , but above FDEP's acceptable level of 1×10^{-6} . David Clowes stated that FDEP is firm that human health risk assessment for cancer must be compared to 1×10^{-6} . Some flexibility may arise in risk management and remediation of a contaminated site, but it would require some form of feasibility study. Compromise may occur when remediation back to 1×10^{-6} is economically or technologically impractical. For borderline risks, i.e., less than 1×10^{-4} but greater than 1×10^{-6} , some type of "focused feasibility study" must be performed to determine if risk can be reduced to the acceptable level. If not, FDEP may have to accept the existing concentration and require a risk management plan.

For sites that have borderline risks or are very limited in area (such as SA 3), the concept of "cumulative risk assessment" was discussed. This method allows considering contaminated and uncontaminated areas in the same parcel designated for transfer, and "averaging" the risk over the entire area. No decision was reached on the suggestion, but FDEP and EPA agreed they would consider the idea.

For SA 3, the BCT, through the Navy, directed ABB-ES to review the sample data, insure the samples were collected using the low flow technique, resample if necessary, and validate the data. After comparing the results with the background data, the results are to be re-presented to the BCT for their consideration.

For SAs 8 and 9, the BCT asked ABB-ES to wait until the background data was available for comparison before presenting the PREs and conclusions.

PREs are to be included as part of the site screening report for each SA for which one is conducted. For sites such as SA 3, the site screening report will include a section on review of remediation technologies to assist the BCT in deciding whether further investigation is justified. This review should address economics, technology, future use, etc.

Naval Hospital EBS Issues

This discussion, led by Wayne Hansel, centered around David Clowes's comments on the final EBS for the Naval Hospital. EPA's comments were not available at the time of the meeting but will be provided to Wayne Hansel by Friday, April 7. The following responses address the comments as they appear David Clowes's letter (copy attached).

- #1,2: The Navy will address the comments and respond in the EBS. A paragraph will be added to address tanks basically stating that all data regarding tanks will gathered according to the Tank Management Plan.
- #3: ABB-ES will add a column to the Group I analytical tables for Soil Cleanup Goals (SCG) for military sites.
- #4: FDEP retracted this comment because, upon validation, arsenic was determined to be non-detectable, and, therefore, no subsurface soil samples are needed.
- #5: ABB-ES is to install a temporary, shallow well; sample using low flow methodology; and conduct a full-suite analysis of the sample.
- #6: ABB-ES will re-evaluate the data for well #OLD-01-02 at UNF-12 for metals only. This may require resampling.
- #7: ABB-ES will provide the requested water level measurement data to the Navy for inclusion in the EBS.
- #8: If the results from comment #6 do not indicate contamination after re-evaluation, then no action is necessary. If contamination is indicated, ABB-ES is to install a monitoring well up gradient and analyze for metals (TAL).
- #9: ABB-ES will provide the requested data from the site screening report.
- #10: ABB-ES will provide the requested data from the site screening report.

Miscellaneous Issues

Wayne Hansel distributed a response letter from the company that owns the pipeline that crosses the McCoy Annex. LCDR Ballinger had written the company with questions regarding its operations. Basically the letter reports that no spills or leaks have occurred from the pipeline on NTC, Orlando property. The BCT agreed that no environmental sampling would be necessary along the pipeline to confirm the contents of the letter.

The meeting adjourned at 1700.



Jul - Aug 95

(5) 4.75

Inter-Office Correspondence

MEMORANDUM

To: Wayne Hansel, SouthDiv

From: Jim Manning, ABB-ES *JM*

Date: July 24, 1995

Subject: Agenda for the 31 July 1995 BRAC Cleanup Team (BCT) Meeting

The BCT meeting will be held in the Public Works Conference Room in Building 2025, commencing at 1300 on July 31. The general plan is to discuss partnering and project team issues on Monday, and to discuss technical issues on Tuesday, August 1. The specific agenda for the BCT meeting is as follows.

Monday, 31 July:

1300-1630 Partnering, Project Team Structure, and Meeting Structure
 1800 Dinner at LCDR Ballinger's Home

Tuesday, 1 August:

0800-0830 EBS and Property Priorities Relative to Reuse
 0830-0900 Status of UST Activities
 0900-0930 Status of IR Activities
 0930-0945 Break
 0945-1100 Dispensation of Group I Sites, Especially Sites 8 and 9
 1100-1200 Miscellaneous Issues
 - Defense Environmental Response Task Force Meeting
 - Discussion of OU2 Workplan Comments
 1200 Adjourn

If you have any questions, please feel free to call me at (904) 269-7012, extension 104.

cc: Capt. D. A. Yesensky, BTC, NTC, Orlando
 LCDR Catherine Ballinger, PWO, NTC, Orlando
 Barbara Nwokike, SouthDiv
 Billy Drawdy, SouthDiv
 Nancy Rodriguez, EPA Region IV
 David Clowes, FDEP
 Susan Goggin, FDEP

Eric Nuzie, FDEP
 Rick Allen, ABB-ES
 John Kaiser, ABB-ES
 Oscar McNeil, Bechtel

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