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Baker

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November 13, 1996

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Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attn: Ms. Katherine Landman
Navy Technical Representative
Code 18232

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0001
MCB Camp Lejeune, North Carolina
Partnering Minutes - July 1996

Dear Ms. Landman:

Attached are the final meeting minutes from the Partnering meeting held on July 10 and 11, 1996 in Dam Neck, Virginia. A copy of these meeting minutes has been forwarded to all of the Team members. These meeting minutes were finalized at the Partnering meeting held at MCB Camp Lejeune on November 6 and 7, 1996. These final meeting minutes reflect the revisions to the meeting minutes requested by OHM.

If you have any questions, please do not hesitate to contact me at (412) 269-2053.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Matthew D. Bartman

Matthew D. Bartman
Activity Coordinator

MDB/lq

Attachments

cc: Ms. Linda Saksvig, P.E., Code 18231
Mr. Byron Brant, Code 1832
Mr. Neal Paul, MCB Camp Lejeune
Mr. David J. Lown, L.G., P.E.
Ms. Gena Townsend, EPA Region IV
Mr. Jim Dunn, OHM
Mr. Brent Rowse, ROICC MCB Camp Lejeune
Ms. Lee Anne Rapp, P.E., Code 18312 (w/o attachment)
Ms. Beth Collier, Code 02115 (w/o attachment)

MEETING MINUTES
MCB CAMP LEJEUNE PARTNERING TEAM
July 10 and 11, 1996

A Partnering Meeting was conducted on July 10 and 11, 1996 between representatives from LANTDIV, MCB Camp Lejeune, USEPA Region IV, NC DEHNR, Baker Environmental, Inc. (Baker), and OHM Remediation Services, Inc. (OHM). The meeting was attended by the following:

- Ms. Katherine Landman, LANTDIV
- Mr. Neal Paul, MCB Camp Lejeune
- Ms. Gena Townsend, USEPA
- Mr. Patrick Watters, NC DEHNR
- Mr. Matt Bartman, Baker
- Mr. Richard Bonelli, Baker
- Mr. Jim Dunn, OHM

Guests who attended the meeting included:

- Mr. Matt Walsh, LANTDIV
- Mr. Mark Barnes, LANTDIV
- Ms. Sherri Eng, LANTDIV
- Mr. Dan Bonk, Baker

The meeting was hosted by Ms. Katherine Landman and chaired by Mr. Richard Bonelli. Additionally, Matt Bartman recorded the minutes.

The minutes are summarized below for each day of the meeting and by topic.

July 10, 1996

The meeting focused on the following items:

- Site 35 access
- Site 73 UST
- RAB
- RCRA
- OU No. 15 and OU No. 16 Investigations
- Long-Term Monitoring
- Comment Update
- Site 80 TCRA
- Address for document submittals
- Site 7 PRAP
- OU No. 12 (Site 3)
- Building 1613
- OU No. 13 (Site 63) ROD
- Lot 203 Treatment Plant
- Biocell
- Site 82
- Ecological Risks
- CAPs for OU No. 1 (Sites 24 and 78)
- OU No. 8 (Site 16) ROD

The first day of meeting began with the traditional check in and review of the minutes from the previous meeting. No comments on the draft meeting minutes were provided. The final minutes from the May Partnering Meeting will be finalized and sent to all the team members.

Site 35 Access

Dan Bonk provided background regarding this issue and how the White Paper (July 2, 1995) was prepared. Dan discussed the wetlands issue, DOT using the Camp Lejeune wetlands bank, the highway construction problems created by an access road at an interchange, the possibility of going over or under the proposed highway, and the possibility of the treatment system going on the other side of the access road.

The following options were proposed to the Team:

1. Direct access of highway via access/deaccess lane. This option is expensive, moderately safe, with high impacts to the wetlands.
2. Park car and walk to the treatment system. This option is low cost, high safety risk, and low impact to wetlands.
3. Access road off treatment plant to the system either along the side of the ROW or within the ROW. This is fairly expensive with low safety concerns, and high impact to wetlands.
4. Tunnel or overpass. This option is very expensive, causes little safety concern, and has no impact on the wetlands. The cost for this option, in the millions, does not include access to the wells.

The team viewed Option #3 as the most viable to approach NC DOT with. Neal pointed out that if we go with this option we will be requesting that DOT give back 15' of ROW. Additionally, Dan and Jim stated that we must work with DOT to bring power via a conduit from Camp Geiger to the system.

Neal stated that he would draft a letter to the state and provide it to the team for review. Neal stated that he would have John Townsend from Camp Lejeune assist with the wetlands matters and the involvement of the Nation Wide Permit No. 38.

Jim stated that we want to be careful with the permit because we may be required to restore the wetlands after the study if we have our own permit. If we are using the states then this will not be the case.

Dan will prepare figures showing culvert extensions prior to a meeting with NC DOT.

Site 73 USTs

Dan provided the team with a review of the Site 73 investigations and a summary of preliminary findings for the additional groundwater investigation that had been completed. Dan provided the following information:

- Phase I investigation showed contamination in the shallow (BTEX) and deep (chlorinated) groundwater
- No contamination was detected at 120'
- Groundwater flow is in the direction of the bay
- There are immediate groundwater receptors

Baker and LANTDIV plan on modeling this site to determine which options (no action, hot spot removal with intrinsic controls, or pump and treat) is the most acceptable.

Gena stated that if the hottest levels could be removed a case may be made for intrinsic controls. Patrick added that he believes that the WiRO will not accept values above the 2L standards.

Dan went on to discuss the format for the UST and IR report submission. Dan explained to the team that when the investigation was done several wells were used to satisfy the UST and IR needs. Samples taken from these wells were analyzed for volatile organics using methods specified by the UST program and the IR program. However, there were some wells that were initially installed just for the IR process but data from these wells will be needed to define the extent of the UST contamination. Dan is not sure if WiRO will accept the IR data in a UST report.

Patrick and Neal felt that we must get an accurate handle on the data and well points that are needed and have a meeting with the WiRO to discuss the possibility of using IR data in a UST report. The differences in the analytical methods are not significant enough to eliminate the use of the data to serve either group.

As for the format of the report (i.e., combining the RI and UST reports) Dan requested input from the Team on how to handle a total of 8 reports. Gena stated that she remembered that in a previous meeting with WiRO that they stated that all reports should be handled as stand alone reports. Dan suggested that submission of the reports be delayed until a meeting with the WiRO could be arranged and their input as to the modeling, investigation findings, and report preparation could be obtained.

Neal stated that he would arrange for representatives from WiRO to attend our next Partnering meeting to discuss issues regarding Site 73.

RAB Update

Neal stated that the RAB meeting scheduled for August would need to be postponed. Neal and Kate will not be able to attend due to other commitments. Consequently, the meeting will be rescheduled for September 11, 1996 at 6:30 PM. Additionally, Neal provided the team with RAB meeting minutes for review prior to distributing them to the RAB members.

RCRA

Neal provided an update to the team regarding the RCRA issue at the base. Neal stated that the State has advised the base that they should not be thinking Corrective Action at this time. The State has requested that additional information be obtained. The base is having ENSAFE conduct additional RFAs. However, Neal stated that the base is going along with the confirmatory sampling at the 40 sites already identified. The draft RCRA Part B Permit could be obtained by September if all information is supplied to the State by the end of July. The task of completing the confirmatory sampling will be assigned to Baker through LANTDIV.

OU No. 15 and OU No. 16

Matt stated that the Project Plans for these two OUs were distributed to the Team at the end of May. The Phase I investigations for both OUs are due to commence at the end of July. Therefore, Matt discussed the scope of the investigations and provided figures indicating the proposed sample points. Questions were raised by members of the Team and a small technical discussion was held. The Team came to consensus that the Phase I approach was satisfactory to define the potential plumes of contamination and provide sufficient information for the Phase II investigation.

Long-Term Monitoring

Kate informed the Team that representatives from the Activity and LANTDIV met to discuss the long-term monitoring and operation and the future contractual mechanism. LANTDIV and the Activity agreed that a contract should be administered through the FSC office to conduct LTM and LTO for the UST and IR sites. Due to the potential dollar amount and technical requirements for this contract it will not be limited to small business. LANTDIV and Camp Lejeune are attempting a FY97 award. Until this contract is in place Baker and OHM will be conducting the LTM/LTO. However, Kate stressed that available money would not allow for any additional technical input than what is currently being conducted. The quarterly and semi-annual reports prepared by Baker and OHM will make recommendation for reducing the frequency of sampling, the analyses, and the number of samples being collected. Any modifications to the sampling program will be discussed with the Team prior to the revision taking place.

Comment Update

Matt provided the Team with the latest revision of the comment tracking form. This form is sent to LANTDIV, the Activity, USEPA, and NC DEHNR to provide them with updates as to what date submittals were sent out, what date comments are due, when and if comments have been received, and when the next submittal is due. It also allows the reviewer to update LANTDIV and Baker as to when they may be able to submit comments.

Site 80 TCRA

Jim Dunn provided the Team with an update on this action. Jim stated that the excavation and revegetation were completed. All of the samples collected from the bottom and sidewalls of the excavation were less than the established remediation levels. Jim estimated that 980+ tons of soil had been removed. This amount was greater than the original estimate but the total cost of the project should see a 50K underrun due to a reduction in the treatment pricing. Preparation of the closeout report will begin in about 45 days.

Additionally, Jim stated that the closeout reports for Camp Geiger and OU No.2 soils will be sent out this week. The Building 25 report will be submitted next week, and the SVE report in 30 days. All of these reports will be in draft version. Comments on the draft closeout report for OU No. 1 and Site 69 are still outstanding.

OU No. 11 (Site 7) PRAP and ROD

Patrick raised concerns on the "No Action" record of decision planned for Site 7. He stated that due to concerns with the risk to future residents from groundwater ingestion driven by beryllium and aluminum, the exceedences of the 2L standards (lead), and the fact that this site was a former dump he doesn't feel that "No Action" is appropriate. Additionally, he doesn't believe that remediation is required but monitoring may be.

Matt provided the Team with figures and synopsis of findings and attempted to explain how the exceedences could be attributed to the temporary wells (no development and place in swamp) and an older monitoring well.

The Team suggested that prior to instituting a monitoring plan that an additional round of samples be collected to determine if the levels of metals are elevated. Matt stated that because these are temporary wells and the other permanent monitoring well is set in the swamp area, the analytical findings may not differ. He would like to review the RI and speak with the Baker geologist regarding the well placement, development, and sampling and get back to the Team with an explanation for the elevated metals.

Gena and Patrick both have concerns regarding the "No Action" and the elevated levels and will need evidence to demonstrate that the levels are attributable to something other than contamination.

OU No. 12 (Site 3)

Patrick raised an issue that the WiRO was concerned about the groundwater contamination in the area of MW06. He expressed that the WiRO was inquiring as to how this was going to be handled. Matt and Kate informed Patrick that as part of the design and long-term groundwater monitoring, well MW06 and potentially additional wells would be installed to monitor the groundwater. It is believed that once the source of the contamination is removed (soil) that the other media impacts will drop significantly. Patrick agreed to this approach and believes that the WiRO will agree with the approach.

Bldg. 1613

Neal informed the group that during a UST investigation conducted for this building, which is located along Holcomb Blvd in the southwest corner of the HPIA, TCE was detected. This area was not investigated during the RI conducted at OU No. 1. Neal requested assistance from the Team as to what to do at this site given that there is petroleum and chlorinated contaminants in the groundwater. Mark Barnes stated the delineation of the petroleum plume could be and would be handled under the UST program; however, the chlorinated contamination should be handled by the IR program.

The Team decided that Bldg. 1613 should be referred to under the IR program as OU No. 18 (Site 94).

OU No. 13 ROD

Neal stated that the base is interested in putting in supply wells in this area of the base and wanted to know if institutional controls should be mentioned in the ROD due to elevated levels of metals (iron and manganese) detected in the groundwater.

Gena and Patrick told Neal that given that these metals are the only two contaminants above the 2L standard and occur above the 2L across the base there is no need for institutional controls or to mention this site in the Base Master Plan. Kate stated that she is hoping that future wells would not be placed in an area where former dumping of any kind took place. Kate stated that information may be placed in the Base Master Plan mentioning the "No Risk" was generated by media at the site; however, it is recommended that a supply well not be placed in this area. Kate will discuss the wording of this statement with Neal.

Lot 203

Jim provided an update for the treatment plant. Instrumentation of the plant is 95% complete. The system testing was completed last Thursday. The automated checkout will be completed next Monday. The plant will not be restarted until it is fully operational on its own. There will be a telephone connector hooked up to a cellular phone. The plant will automatically dial if a problem arises with the system.

The biocell is completed. The soils known as "Mt. Jones" have been analyzed and have been determined to be clean. The cleanup of Lot 203 will begin next week.

Kate wanted to know when the transfer from startup to formal operation will occur. Jim stated that the final inspection is next week after which time the formal operation will begin.

Biocell

Matt began the discussion by mentioning that the biocell permitted for POL waste was being considered for use for the treatment of PAH contaminated soil that will be excavated for OU No. 12 (Site 3). If this is feasible the permit for the biocell will have to be modified to accept PAH contaminated soil.

Jim was not sure what it would take to change the permit or if the permit could be modified to accept different wastes. Jim said that Brent Rowse from Camp Lejeune EMD would be the most informed source to consult regarding permitting.

Gena expressed that we will now be handling mixed waste in the biocell and may want to consider treatment of the Site 3 soil via a biopile. Jim stated that if a biopile was used there would not be no need to aerate it. Gena suggested that we may also want to consider on-site treatment.

Matt said that he would talk these issues over with Baker's engineer and discuss possibility of modifying the permit with Brent. However, if he remembered the volume of soil that is required to be removed, on-site treatment may not be the best alternative.

Site 82

Jim provided the Team with the discharge limits that will be used to monitor the discharge levels from the plant. The plant will be operated at this discharge limit.

Gena wanted to know if sampling at the plant will be for remediation goals.

Jim noted that NPDES will be reported against the effluent. Plant intake and discharge will be reported against Remediation Levels. Initial tests indicated that the plant had difficulty achieving the remediation goal of 50 ug/L for manganese.

Eco Risk

Sherri Eng (LANTDIV) provided the Team with an update regarding the status and future role of ecological risk assessments in the RI process. The Center for Naval Analyses (CNA) conducted a statistical analysis of 80 sites for which ecological risk assessments were performed. From this study, answers to the following questions were attempted:

1. Are Eco Risks productive?
2. Is the money being spent beneficial?
3. How much of an impact does the eco risk have on the ROD?

In order to complete this study the CNA reviewed 80 RIs with Eco Risks. Of these 80, 27 have gone to ROD, with 6 having an impact from the eco risk. What the study indicates is that regardless if 10K or 2M dollars were spent the qualitative data was the same. However, it was demonstrated that the Navy was not paying for duplication of efforts. The Navy informed the regulators that they should be seeing the qualitative eco risks only. Additionally, Congress has requested that the services join together to formulate a tier approach to eco risk assessment guidance.

Sherri provided the Team with copies of the EPA 1994 Tri-Services Guidance for Eco Risks. To date the agencies have agreed with this approach but still believe that data must be collected.

CAP for OU No. 1 (Sites 21 and 78)

Matt requested that Neal provide some clarification as to how he wanted Baker to proceed with preparing the CAP. During the meeting with WiRO, Neal had mentioned the possibility of getting Public Works at CLEJ to shut down and abandoned all of the supply wells in the HPIA, including 637 and 640. However, after additional consideration it was determined, through several rounds of groundwater sampling, that these wells have not been impacted. Therefore, there is no technical reason to abandon these wells. Baker would like to revise the CAP using these two wells as the point receptors and conduct modeling to these points. Based on the comments from the WiRO the CAP will need to be revised and submitted for approval. However, until a decision can be made as to the status of these supply wells an attempt to submit the CAP may not be worthwhile.

Neal will speak with the WiRO regarding their position on these wells and direct Baker on how to proceed with the CAP.

ROD

Matt discussed comments that the EMD received from the Camp Lejeune attorney, Capt. Allen, regarding the final ROD for OU No. 8 (Site 16) (see attached).

Gena indicated that EPA attorneys have reviewed this "No Action" ROD and have not provided comments on it.

Kate said that she would have LANTDIV's attorney speak with Capt. Allen regarding this ROD.

Matt said he would follow up with Neal and provide a written response or contact Capt. Allen if needed.

Action Items

Rich

Call Kevin Koporec at EPA Region IV to find out the status of risk assessment comments for OUs No. 6, 9, and 13.

Matt

Look into possibly resampling groundwater at Site 7 for metals that exceeded the 2L standard, and provide information to Gena and Patrick regarding the initial sampling to explain the detected levels.

Talk to Neal and provide responses to Capt Allen's comments on the ROD for OU No. 8.

Neal

Prepare letter to disseminate to the Team regarding the Wetlands permit at Site 35.

Contact the WiRO regarding a meeting at Camp Lejeune on Sept 10, 1996 to discuss Site 73 USTs and the use of IR analytical data to define contamination within the UST.

Kate

Speak with Neal regarding the wording for supply well placement in the Base Master Plan.

Speak with Dave Sheppard, LANTDIV attorney, and ask him to contact Capt. Allen regarding the ROD for OU No. 8.

Talk with Bill Mullen regarding model for Site 73 and schedule for modeling being conducted under CTO-0140.

Patrick

Get back to Kate regarding analytical data collected for Site 36.

Next Meeting

Date: September 10, 11, and 12, 1996
Location: Camp Lejeune
Chair: Jim Dunn
Host: Neal Paul

Agenda Topics for Next Meeting

Meeting with WiRO regarding Site 73 UST (data and reports)
Provide agenda items to Jim Dunn