



ENVIRONMENTAL MANAGEMENT GROUP

MARK WEST TWO
OFF MINE ROAD
PITTSBURGH, PA 15275-1071
(412) 788-1080

07.01-01/07/91-02118

C-49-11-0-218

January 7, 1991

Commander, Atlantic Division
Naval Facilities Engineering Command
Environmental Quality Branch
Norfolk, VA 23511-6287
ATTN: Ms. Laurie Boucher (Code 1822)

Dear Laurie:

Enclosed please find two (2) final copies of the Meeting Minutes (EPA Region IV) of November 20th. Also attached are the "handouts" EPA Supplied (for the record).

Please call with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Vicki L. Bomberger".

Vicki L. Bomberger
Program Manager

VLB/sic

Enclosures

cc: Daryl Hutson
File

MEETING NOTES
NOVEMBER 20, 1990
9:00-11:30
USEPA REGION IV
ATLANTA, GEORGIA

ATTENDEES

| | | |
|------------------------------------|--|----------------|
| Jack Butler (JB) | Environmental Engineer North Carolina Superfund Section | (919) 733-2801 |
| Andrew Kissell (AK) | Supervisor Environmental Engineer Atlantic Division Naval Facilities Engineering Command | (804) 445-2931 |
| John Thompson (JT) | Assistant Counsel Atlantic Division Naval Facilities Engineering Command | (804) 444-9507 |
| Laurie Boucher (LB) | RPM, Marine Corps Base Camp Lejuene Atlantic Division Naval Facilities Engineering Command | (804) 445-1814 |
| Steve Hinkle (SH) | OSJA Marine Corps Base Camp Lejuene | (919) 451-2321 |
| Stephany Del Re'- Johnson (SDJ) | IRM Marine Corps Base Camp Lejuene | (919) 451-5093 |
| Vicki L. Bomberger (VB) | NUS Corporation Project Manager | (412) 788-1080 |
| Wayne R. Mathis (WM) | Federal Hazmat Coordinator USEPA Region IV OPM-FAB-FFC | (404) 347-3776 |
| Carl Froede Jr. (CF) | Marine Corps Base Camp Lejuene RPM Waste Division/RCRA/FFB USEPA Region IV | (404) 347-3016 |
| Micheal J. Hartnett (MH) | Chief DOD Remedial Unit Waste Division/RCRA/FFB USEPA Region IV | (404) 347-3016 |

MEETING OBJECTIVES

(MH): The main topic today is the site management plan. EPA feels that with the size of the "base" and number of sites, a management plan is needed. Sites need prioritization. EPA intends to track on a yearly basis. (Navy can select start month.) The year time frame represents what EPA will track progress against. Activities beyond the impending year shall be shown briefly.

(SDJ): Will sites be referred to as Operable Units?

(MH): The grouping of sites and/or referencing of sites as operable units is up to LANTDIV/Lejuene. Groupings can be based on media, location of sites, etc., whatever makes sense relative to study and/or budget.

(AK): LANTDIV/Lejuene has discussed this concept also. We agree that prioritization is needed and intend to implement a plan accordingly. We would like to be able to show progress, including completion of some sites in a reasonable time frame.

(MH): EPA needs to know what you are doing, when, etc.

(WM): Keep in mind that once schedules are established you must keep to schedule or enforcement actions must kick in.

(MH): EPA needs to know when major or primary documents are due. Main goal is to get into "remediating" problems as opposed to producing RI's. We want to see ROD's implemented.

(AK): We intend to move ahead on a number of sites. AK described possible staging of activities.

(WM): LANTDIV may find that EPA may not be able to support all reviews etc. in as timely a manner as LANTDIV may need.

ROD'S

(MH): There are two types of ROD's (Interim & Final). Final ROD only occurs after all sites are resolved. All ROD's on a site by site basis until the final ROD are called Interim RODs. May even reassess interim RODs as new information (data) is available. Interim RODs are not cast in stone.

(WM): Does LANTDIV understand EPA's position on ROD's, in that we need public concurrence on the remedial alternative selected.

(SDJ): Why would we have an interim ROD at discrete (stand alone) sites? We would like to delete Sites as we progress.

(MH): You can't do a final ROD until all sites are completed (per NPL). This NPL language may change. Can't do a deletion until all sites are addressed and when the Final ROD is issued, at which point, public concurrence is required. (EPA recognizes need for removals under certain circumstances).

(LB): If a "proposed plan" is approved it becomes the ROD document also? I thought two documents were needed.

(MH): They are basically the same. [Editorial Note: The PRAP and ROD are two separate documents.]

(SDJ): We would like to show {public} that sites are being "crossed off list".

(MH): The issue of Subpart K still needs to be resolved at HDQ's. Remember that regulations were set up for private sites as opposed to "bases" or federal facilities with multiple sites. (1-2 Operable Units vs. Multiple).

(AK): We still would like to show progress. The term "interim" is tentative.

(MH): Call it a "ROD". You just can't call it a "final ROD".

(SDJ): My concern is with public perception, that we want to show progress.

(MH): Don't need to call the ROD interim call it a ROD, but can't call it final ROD.

SCHEDULE

(CF): We have an example of a time line used at a Florida Site. This is an example of what we would like to see from Navy. We also have a Pensacola example. This study has phasing of OU's (Operable Units). Calendar year is 89-90, then the last few years are shown briefly at end. Schedules in final years can't be firm at this point. Operable Unit groupings may change.

(MH): We want to see the schedule for primary documents.

(AK): I see fiscal years on this schedule.

(LB): Ours is set up on June to June basis.

(MH): Whatever you want, as long as its on a year to year basis.

(CF): I have another timeline example we would like to see in your work plan. This is important - we would like to see schedule so we can plan on going out and obtaining split samples with you, etc.

HADNOT POINT

(CF): Have you all received Hadnot Points Comments? (ESE Work Plan)

(LB): No, not yet.

(MH): We are starting to send out confirmation letters for primary documents.

A discussion of Hadnot Point Contamination (particularly groundwater) recovery of fuel product ensued. There was a communication error among parties. EPA/State thought at one point that only fuel would be cleaned up. It is Lejuene's intention to address entire site - fuel recovery is just first step.

SITE PRIORITIZATION

(CF): In prioritization of sites - EPA would like to be part of review.

(MH): The Site Management Plan is a primary document.

(AK): Are you looking for backup/justification on prioritization.

(MH): We are looking for "rationale" more than justification.

(CF): This is important for public review.

(SDJ): Is the scope for Homestead (see attached reference material) what you want?

(CF): Look at our comments for that particular site (attached) - our theme is:

- o Prioritized Units
- o Shorten work time (want to see 18 months period)

Note: (MH) did stress that there is no set time limit for investigations, schedules are site and investigation specific.

(CF): We also have given you a ROD guidance package. It shows how to write a proposed plan.

We also have two samples of "real life" plans from Florida we have sent to you. There are two RODs generated for plans.

We sent 1) guidance document and 2) actual examples.

(CF): Also submitted are task breakout for plan.

Enclosure 3 is a primary document schedule which is what we would like to see (long term view).

Enclosure 4 is the generic primary and secondary documents description.

We also distributed July '89 Guidance on Preparing Superfund Documents: Interim Plan.

NAVY COMMENTS:

(AK): We have a few points we would like to address also. We have 5 sites we would like to start with. We are limited by staffing resources (besides money) as to how much we can "manage."

(MH): EPA is in same resource situation.

(AK): Situation in Iraq may also impact our ability to move forward "rapidly" at some point.

REGION IV DIRECTIVES

(MH): I want to address Enclosure 4 briefly. This is EPA Region IV Guidance (Outline) not EPA HQ. This is what we need to see. This is our latest guidance (it may conflict with FFA terminology and we

can upgrade FFA language). (This, revised guidance is tailored to what you are doing).

(CF): I will be out until December 14th. During interim please contact M. Hartnett.

NAVY COMMENTS CONTINUED

(AK): We have several other issues we want to discuss.

Do you want to see quality assurance data? i.e., all backup data packages with analytical test results?

(CF): We don't need it, but it should be available.

(SDJ): Does 120 day schedule shown in Federal Facilities Agreement refer to documentation of analytical results shown in the RI report or provision of data and/or data packages?

(CF): No--just data, there is a separate timeline for the RI Report.

(MH): EPA may want backup data (complete data package with QA backup) for split samples if there is a conflict in results.

(AK): Are you going to consolidate EPA and State comments, or will we get separate comments?

(MH): You will get comments from State and EPA separately, although we will coordinate comments. You may get conflicting comments, but we will try to avoid it.

(MH): We may have a time crunch and can't coordinate thoroughly with the state.

(SDJ): I have comment regarding community relations. Our community relations personnel have left for "Desert Shield". This will result in a change in the Community Relations Plan.

(MH): Just send us a letter with change noted.

(CF): Teamwork/coordination of this group (State/EPA/Navy/Marine Corps) is very important.

(LB): When we send you draft reports - at end of 60 day review - we would like to have TRC so we can finalize documents.

(MH): We have RPM meetings and TRC meetings -- both with separate objectives.

RPM - FFA requires 3 parties (EPA must have meeting)
TRC - Keep public involved.

Generally we have RPM meeting first.

(CF): I think at the end of 60 days you would want to review our comments. Then 30 days later schedule TRC (unless there are problems with comments). Key is we would like to resolve all issues before having TRC so we can present a united and coordinated front.

(LB): You have 60 days for comments. We then have 60 days for revisions. We would like to insert TRC in this time frame so that 60 day Navy turnaround time for submission of Draft Final documents is met.

(MH): TRC is required by Navy - it is up to you when you conduct it.

(AK): You would be receptive to schedule changes if we have major comments. Also if something comes up in TRC's.

(CF) and (MH): Yes

(WM): Again, we would like to present a unified front at a TRC.

(MH): We usually prefer RPM meetings prior to TRC to resolve issues. TRC is not in FFA, as it is a Navy requirement.

(LB): What about detailed scope of work.

(CF): Look at Homestead example, SMP is different than Work Plan.

Work Plan will have the detailed scope, not in SMP (Note: SMP is primary document).

It is not required that EPA be provided detailed scopes submitted by LANTDIV to the Consultant preparing the Work Plans. Subsequent Work Plans should provide to EPA the detailed scope.

The meeting concluded at 11:30.

ACTION ITEMS:

Navy is to prepare Site Management Plan.

Notes: Carl Froede will be out of the office through December 14th. Micheal Hartnett will handle questions.

VLB/sic

Attachments (Final Only)

- o Enclosure I through IV
- o Additional Handouts