

RAB Minutes

NAS North Island

Restoration Advisory Board

Introduction

The fifty-sixth Restoration Advisory Board (RAB) meeting for Naval Air Station (NAS) North Island/Naval Amphibious Base (NAB) Coronado was held on Wednesday, May 20, 1999, at the Coronado Public Library from 6:30 p.m. to 8:35 p.m.

Mr. Collins called the meeting to order at 6:35 p.m. and welcomed RAB members and the public.

RAB Attendance

Bill Collins, Carla Fargo, Laura Hunter, Sandor Kaupp, John Locke, Robert Logan, Larry McCauley, Richard Mach, Foster Marshall, Jennifer Rich,

Public/Navy Attendance

Mark Bonsavage, Stephan Dertadian, Marilyn Field, Stephanie Kaupp, Nancy Lee, Tracey Mogg, Kathryn Parker, Debbie Wankier, Bruce Willett, Rich Wong,

Approval of March 31, 1999 Meeting Minutes

Carla Fargo indicated that she had several comments on the minutes but could not locate her comments. No other comments were provided. It was agreed that Carla would send her comments to the Navy for revision to the minutes, which will be approved at the June 1999 RAB meeting. Approval of April 21, 1999 Meeting Minutes.

The RAB requested the addition of Laura Hunter's questions prior to the responses. Mr. Collins noted the approval of the April 21, 1999 meeting minutes, with the addition of Laura Hunter's questions—that were presented by Ms. Carla Fargo. The revised April 1999 meeting minutes were distributed to the RAB members.

Meeting Topics

The May 1999 meeting topics were the Federal Facility Site Remediation Agreement (FFSRA), Site 5 Monitored Natural Attenuation Study and Time Critical Removal Action, Site 9 soil vapor extraction (SVE) System/Steam Injection status, Interim Measure Assessment/Current Conditions Report (IMA/CCR), and Community Relations Plan update.

Presentations

Federal Facility Site Remediation Agreement (FFSRA)—Mr. Bill Collins, Southwest Division, Naval Facilities Engineering Command (SWDIV), Lead Project Manager

The first presentation was for the FFSRA that was signed between the California Department of

Toxic Substances Control (DTSC) and the Navy on January 13, 1999. It identifies the jurisdiction where both the state and the Navy wanted to document for the record why they were entering into this agreement. For California, they derive their authority through the Resource Conservation & Recovery Act (RCRA) and through the California Health and Safety Code.

For the Navy, jurisdiction questions were answered by the Comprehensive Environmental Response Compensation and Liability Act (CERCLA); the National Environmental Policy Act (NEPA); the Defense Environmental Restoration Program (DERP); and the Executive Order 12580—the one where the President deferred authority, given to him by Congress, to the Department of Defense, to manage the CERCLA sites.

The Navy is the owner and operator of the hazardous waste facility. The Navy was awarded a hazardous waste facility permit on December 21, 1989; it's been updated since then. The hazardous wastes have been, and continue to be, released into the environment. In 1983, the Navy identified 12 hazardous waste disposal sites. In 1986, contamination was detected in the ground or in the soil at the Industrial Waste Treatment Plant. In 1984, the Navy installed wells at the Industrial Waste Treatment Plant, and found chlorinated compounds in the groundwater, and they've been detected right up to the present. Also, in 1989, the DTSC went out to NAS North Island and conducted a RCRA Facility Assessment and checked on chemicals or areas where chemicals may have been released into the environment. As a result, DTSC concluded that further investigation was necessary. They concluded that hazardous waste had migrated from the facility into the environment via the soil and groundwater, and that contaminants include volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), heavy metals, petroleum hydrocarbons, and polychlorinated biphenyls (PCBs).

The purpose of this agreement is to satisfy the Navy's corrective action obligations required by the permit. Every RCRA hazardous waste permit that's issued has corrective action requirements in them. It's also to resolve the litigation between the Navy and the State surrounding the Corrective Action Order that was issued May 30, 1997. In addition, it's intended to coordinate the Navy's satisfaction of its corrective action obligations under RCRA and CERCLA. Both laws require the Navy to clean up the sites. Mr. Collins then went into detail on each section of the FFSRA.

The sections of the agreement are as follows:

Section 1—Jurisdiction, Section 2—Findings of Fact, Section 3—Determinations, Section 4—Purpose Section 5—Scope of the Agreement, Section 6—RCRA CERCLA Coordination, Section 7—Definitions, Section 8—Work to be Performed, Section 9—Project managers, Section 10—Document Review and Approval, Section 11—Emergencies and Removal Actions, Section 12—Deadlines and Site Management Plan, Section 13—Budget Development and Amendment of the Site Management Plan, Section 14—Submittals, Section 15—Proposed Contractor/Consultant, Section 16—Quality Assurance, Section 17—Sampling and Data/Document Availability, Section 18—State Certification, Section 19—Extensions, Section 20—Force Majeure, Section 21—Dispute Resolution, Section 22—Other Claims, Section 23—Reservation of Rights, Section 24—Real Property Transfer, Section 25—California Environmental Quality Act, Section 26—Permits, Section 27—Compliance with Applicable Laws, Section 28—Access, Section 29—Enforceability, Section 30—Record preservation, Section 31—Notices to Contractors and Successors, Section 32—Modification, Section 33—Termination, Section 34—Effective Date, Section 35—Notification, Section 36—Release of Records, Section 37—Public Participation, Section 38—State Support Services and State Oversight Costs, Section 39—Severability, Section 40—Integration, Section 41—Section Headings, Section 42—Attachments, and Section 43—Representative and

Authority.

A copy of this agreement is located in the Information Repository, at the Coronado Library for viewing.

Site 5 Monitored Natural Attenuation Study—Mark Bonsavage, SWDIV, Remedial Project Manager (RPM)

Mr. Bonsavage explained that a study called the Evaluation of Monitored Natural Attenuation of Groundwater at Site 5 was completed. Parsons Engineering was hired to study the groundwater out at Site 5, for four- quarters. They measured the VOCs, and they also measured the other chemical parameters of the water that would contribute to the chemicals naturally attenuating over time. (Attenuation includes biodegradation, hydrolysis, dispersion, dilution, and adsorption.)

It was found that Monitoring Well 21 had dichloroethene (DCE) at 550,000 parts per billion (ppb), which is considerably high. The Navy decided to use the California Ocean Plan standard of 3.2 ppb for DCE as the total VOCs cleanup goal to run the Bioscreen model.

This information was entered into the computer program, Bioscreen, where it took into consideration all the water chemistry parameters and demonstrated how the plume will shrink over the years, considering all the factors that make the VOCs naturally attenuate. The results were that after 20 years, about 95 percent of the chemicals will have attenuated, and after 40 years around 99 percent. Therefore, the last 20-30 years will attenuate the final approximately 1 percent.

As a result of the testing, it was determined to extract source areas of the contaminants at Site 5 rather than wait for them to naturally attenuate.

Site 5 - Time Critical Removal Action—Richard Mach, SWDIV RPM

Mr. Mach agreed with Mr. Bonsavage's assessment of Site 5, that the monitoring costs for natural attenuation would likely exceed the cost of active source remediation. There are approximately six technologies that will be further evaluated in the Action Memorandum, before a final decision will be made as to which technology to use. There will be an Action Memorandum and a draft work plan out for review in July 1999.

Mr. Mach presented the draft technology screening matrix and stated that each of the viable technology alternatives will be evaluated in the Action Memorandum. Mr. Mach stated that his "gut feel" is that some form of chemical oxidation will be chosen as the preferred treatment option for the site.

Site 9 - Non-Time Critical Removal Action, SVE System/Steam Injection Status Update - Richard Mach, SWDIV RPM

Mr. Mach provided a schedule showing that most of the pilot study for the steam injection enhancement and free product recovery system has been installed. As part of the pilot study, the free-product recovery was scheduled to start May 20, 1999. This process will run for about 20 to 30 days of skimming-off the free-product to see how fast the recovery is, and how much-free product can be removed.

After 20 or 30 days, the steam injection process will start. Steam will be pumped at about 200 degrees Fahrenheit. It's anticipated it will take about 60 days to heat up the entire subsurface to about 195 degrees. The SVE system will be on at that time to remove any VOCs, which are

volatilizing from the free during the steam injection.

This process will continue for another 30 days or so after the entire system is heated up. This will assist in determining what the radius of influence is for steam injection, and what it is for the SVE system. These results will help to optimize the full-scale design.

Within about a year, using steam injection, most of these volatile compounds—the chlorinated compounds that are risk drivers—should be able to be volatilized off and removed. Then the recoverable portion of the petroleum, which could be approximately 50 percent, should be able to be removed during the next couple of years.

It was stated that a revised health risk assessment (HRA) would be part of this project, with the new parameters. The initial health risk assessment, three years ago, had shown that if 9 tons were emitted, it would be less than 1-in-a million risk. Only one ton was emitted, so essentially the risk is probably more like 1-in-10 million as opposed to 1_in-a million. In addition, if the constituents change, or the ratio of constituents change by more than 10 percent, there is a requirement to revise the HRA.

Interim Measure Assessment/Current Conditions Report (IMA/CCR)—Bill Collins, SWDIY Lead Project Manager

Mr. Collins discussed the IMA/CCR, which evaluates all of the areas on the island where there is reason to believe there may be some hazardous waste that was dumped in the past. This document helps evaluate where wastes may have been disposed, and decide whether or not there is an immediate risk. This document will also provide the current condition of each site.

The Installation Restoration (IR) Program is something that the Navy runs to clean up its hazardous waste. It's governed by CERCLA and by the Superfund Amendments and Reauthorization Act (SARA). It's also, in many ways, governed by RCRA. A group of tanks that will become part of the program are the hazardous waste and hazardous constituent tanks. In many cases the Regional Water Quality Control Board (RWQCB) has been providing oversight for those and providing advice to DTSC. DTSC has the ultimate authority for them, but the RWQCB has been providing assistance.

There were objectives to the report: Evaluate the current condition of each solid waste management unit (SWMU) and area of concern (AOC), and conduct an interim measures assessment for each SWMU and AOC.

Group A, included 11 of the 12 IR sites (Site 11 is included with group C) and 1 AOC.

Group B, is the underground storage tanks. Out at the fuel-farm, there are seven SWMUs. There is also another group of 22 SWMUs. They've been closed, and there is no further action concurrence from either the RWQCB or the County (Site Assessment and Mitigation Division [SAM]), and they will be submitted to the DTSC for their concurrence.

There is an additional group of 14 SWMUs that the Navy has recommended for closure and no further action concurrence, and is in the process of waiting for an approval.

Also, there is another group of nine SWMUs with ongoing or recommended site assessment.

Group C, located at the Industrial Waste Treatment Plant (IWTP)—at this location there is IR Site

11 that consists of two SWMUs, surface impoundments with SWMUs 11 and 81. There is also the old IWTP, non-surface impoundments, and the Oily Waste Treatment Plant (OWTP), the Oily Waste non-surface impoundments. There are ancillary pipelines running throughout the area, many were removed this summer, fall and spring.

There's also the Collection Storage Transfer Facility (CST) in the same compound. There's another area where PCBs were stored (located off-site), and it has been closed and torn down.

Group D involved the pipelines and the pump stations.

At this location there are approximately 35 miles of pipeline, it's a maze that goes everywhere, and will be probably the largest area to clean up on the island.

Groups E, F, and G include all of other areas where waste was previously generated or continues to be generated. The previous generators will be investigated under the IR program based on their relative risk ranking. The current generators must meet RCRA compliance, but will not be investigated until they cease operations, which could be as long as 50 years or more.

The IMA/CCR report issued by June 3rd. It will describe the base, what is known about the site, what is located at the site, and the corrective action that will take place next. It will contain various maps and it discusses all 140 SWMUs.

Community Relations Plan Update—Bill Collins, SWDIV Lead Project Manager

The Community Relations plan was finalized and was mailed on or about May 3, 1999. A hard copy or CD-ROM were mailed to every member of the RAB.

Mr. Mach encouraged the use of the Information Repository located in the Coronado Library. He indicated that there are two new shelves, underneath the library's sand sculpture where all of the RAB documents are kept for viewing. He also stated that all of the RAB binders have been color coded—blue, are "general", red, are "out for review", orange or yellow, are "for NAB", and green are the "NAS North Island" documents listed by site. John Locke is working on getting a computer, for CD-ROM use. Mr. Mach also mentioned that users of the Information Repository, to please sign-in.

Agenda Items For Next Meeting

NAS North Island, Site 9 SVE System/Steam Injection status update.

NAB Coronado Extended Site Inspection (ESI)

San Diego Bay Munitions Preliminary Assessment Upcoming Meetings

Wednesday, June 16, 1999

Wednesday, August 11, 1999

Thursday, September 16, 1999

Thursday, October 21, 1999

Wednesday, December 1, 1999 (Note New Date)

Meeting Adjourned

Mr. Collins concluded the meeting, and the meeting adjourned at 8:35 p.m.

Public Questions and Comments

Federal Facility Site Remediation Agreement (FFSRA)

Ms. Field asked, "What was the litigation about that the Federal Facility Site Remediation Agreement was designed to resolve? Mr. Collins replied, "We challenged the state's authority to issue a Corrective Action Order. Nothing more than that."

Ms. Field had another question, "Under Section 13, the Budget Development of the Management Site Plan, I was interested in the budget development process. As you talked about, sometimes you have money cutbacks and they may impinge on your budget, but how do you work out an acceptable budget between you and DTSC for cleanup?" Mr. Collins answered, "First, we pick the projects that we think should go forward. Generally, if a cleanup project is in process for remedial action or an interim removal action is taking place at the site, those projects get funded first every year. We keep the cleanups going on. Then there's another set of criteria for projects after that, and that really comes down to risk. We try to put the money where the real problems are. So rather than go out and investigate a little park where somebody thought something was spilled 20 years ago versus going out to Site 9 and actually doing something, finding it, and getting something cleaned up, we go to where the risk really is. And then you have a second tier of sites where there's less risk but there is still a need to know what's out there or to evaluate them and we try then to filter those in. And we know that the federal budget, as far as the environmental restoration goes, has a cap on it. Basically over the past several years North Island had been getting 7.5 to 8.5 million dollars. We know about what we're going to get, and we can evaluate the projects we want. We base it on what we've done in the past, we can come up with a dollar value for what they're worth, and then we just back them down, and finally we end up at zero. And then projects after that we try to move them to the next year, the following year."

Ms Hunter asked, "If there's a violation of the FFSRA, what's that a violation of? The agreement? Your haz waste permit? CERCLA? RCRA?" Mr. Collins answered, "It's a violation of the agreement first. We try to resolve it in the agreement. If that fails, they'd fall back on the permit."

Mrs. Kaupp asked, "I'm curious to know with all the cleanup activity at North Island why it wasn't classified a Superfund site." Mr. Collins answered, "That's an EPA decision, and I believe DTSC - California as a whole, has had something to say to EPA about that, but we weren't told any of it." Ms. Rich added, "Actually, that would be USEPA. They're the ones that handle that. They're the ones that make that determination, not the state's EPA."

Mrs. Kaupp then asked, "If it was listed as a Superfund site, would North Island get a bigger chunk of money for cleanup activities instead of the 7 percent?" Mr. Collins replied, "Not really, no. Because actually EPA and DTSC and the Water Board, they've all decided that rather than devote the money just to National Priority List (NPL) sites, they want to spread it around where the risk is present. So if we were NPL, we wouldn't necessarily get any more money."

Site 5 Time Critical Removal Action

Mrs. Kaupp asked, "Could Site 5 be leaching materials or whatever into the storm drain outfall?"

Mr. Mach stated, "No." Mr. Bonsavage added, "We've basically got the plume surrounded with monitoring wells, and we know that it's going in one direction and it's going slow."

Site 9 Non-Time Critical Removal Action

Ms. Fargo asked, "What volume of free product you anticipate removing?" Mr. Mach replied, "A guesstimate is that there is about 300,000 to 600,000 gallons down there. If you look at any of the petroleum industry calculations, they generally say they can get up to about 50 percent of the petroleum out. That's how much is recoverable."

Mrs. Kaupp asked, "What percentage of the VOCs will be captured, and will there be a certain percentage that will just go into the air?" Mr. Mach replied, "We're using the same system that was there for the soil vapor extraction before. That system was 99 percent efficient, so possibly 1 percent will escape through there."

Interim Measures Assessment/Current Conditions Report

Mrs. Field asked, "Is this a Superfund site?" Mr. Collins replied, "Congress decided that military installations would follow the same rules as the Superfund sites."