

November 7, 2005

Via e-mail

Mr. Jesse Perez
HQ/AFCEE
3300 Sidney Brooks
Brooks City Base, TX 78235-5112

Subject: Meeting Minutes,
Contract FA8903-04-D-8675, TO 0006; B-3 and AOC-65 Interim Remedial Actions
Contract F41624-01-D-8544, TO 0019; SWMU and AOC Closures
Camp Stanley Storage Activity (CSSA), Texas
Parsons Job Numbers 744223.01000 and 743345.05000

Dear Mr. Perez:

Attached please find minutes for the October 13, 2005 meeting held at CSSA. The topics discussed were groundwater long-term monitoring optimization (LTMO) process and recommendations, the pending removal action and bioreactor treatability study at SWMU B-3, waste management plan (WMP) status, and transition to Texas Risk Reduction Program (TRRP) for Solid Waste Management Unit (SWMU) closures. A copy of the presentations used for the meeting and the meeting agenda are attached to the meeting notes.

After CSSA and AFCEE comments are received on the meeting minutes, they will be submitted to TCEQ and EPA for comment. Please let me know if you have any questions or comments.

Sincerely,



Brian Vanderglas
TO 0006 Project Manager

Attachments

xc: Brian Siegfried, AFCEE
Glaré Sanchez, CSSA
Jeff Aston, CSSA
Brenda Shirley, CSSA
Chris Beal, Portage
Ken Rice, Parsons
Brian Vanderglas, Parsons
Julie Burdey, Parsons
744223 Project File
743345 Project File

**TECHNICAL INTERCHANGE MEETING
MEETING MINUTES**

**CAMP STANLEY STORAGE ACTIVITY, TEXAS
FA8903-04-D-8675/DELIVERY ORDER 0006
F41624-01-D-8544/DELIVERY ORDER 0019
PARSONS 744223.01000 AND 743345.05000**

Date: Thursday, 13 October 2005
Time: 10:00 A.M. - 1:00 P.M.
Place: Camp Stanley Storage Activity (CSSA)
Subject: Groundwater LTMO Recommendations; SWMU B-3 Removal Action and Bioreactor Work, WMP Status; TRRP Transition for SWMU Closures

Attendees:

Attendee	Organization	Phone
Glaré Sanchez	CSSA ENV	(210) 698-5208
Jeff Aston	CSSA ENV	(210) 336-1270
Brenda Shirley	CSSA ENV	(210) 295-7320
Chris Beal	Portage	(210) 295-7417
Jorge Salazar	TCEQ, Region 13	(210) 403-4059
Abigail Power	TCEQ, Region 13	(210) 403-4064
Sonny Rayos	TCEQ	(512) 239-2371
Brian Vanderglas	Parsons	(512) 719-6059
Julie Burdey	Parsons	(512) 719-6062
Eric North	Parsons	(512) 719-6054
Kimberly Vaughn	Parsons	(512) 719-6816
Ken Rice	Parsons	(512) 719-6050

*Minutes prepared by Eric North, Julie Burdey, and Brian Vanderglas

Attachments:

1. Meeting Agenda
2. Slide Presentation
3. Hand-outs

INTRODUCTIONS AND REQUIREMENTS

Meeting presentations were made by Kimberly Vaughn (LTMO), Brian Vanderglas (SWMU B-3 Remedial Actions), Ken Rice (Waste Management Plan), and Julie Burdey (SWMU Closures under TRRP). The purpose of the meeting was to discuss the long-term monitoring optimization (LTMO) recommendations for the CSSA sampling network, the work elements involved in implementing the SWMU B-3 removal action and subsequent construction of a bioreactor in the open excavation trenches, the status of the Waste Management Plan (WMP), and transitioning solid waste management unit (SWMU) closures to the Texas Risk Reduction Program (TRRP) guidance. The meeting discussions were conducted per the meeting agenda attached to these minutes (Attachment 1). All attendees were present for all portions of the meeting, except for a brief portion during the B-3 and TRRP discussions that were missed by Eric North and Jeff Aston. Meeting notes are included on the attached pages. The meeting slides are included as Attachment 2, and hand-outs from the meeting are included as Attachment 3.

At the close of the meeting, the meeting participants drove to the SWMU B-3 site to see where the upcoming remedial action will take place. A windshield survey was conducted of other SWMUs and AOCs in the vicinity of SWMU B-3.

MEETING NOTES

(Thursday, October 13, 2005)

1. OUTFALL 001 AND AST UPGRADE DISCUSSIONS

This portion of the meeting was presented by Kimberly Vaughn. The main points that were covered during this discussion included:

- Methodology for determining the sampling frequency and sampling network based on the LTMO process.
- LTMO recommendations including wells proposed for future monitoring and recommended frequencies.

Kimberly Vaughn explained the background of the LTMO process and the methodology used to determine which sampling points would be included in the sampling routine and the associated sampling frequencies. Kimberly presented slides covering the current CSSA monitoring program, temporal and spatial statistics, the combined evaluation flowchart, and the final LTMO recommendations for CSSA (Slides 4-13). These recommendations are presented in the report submitted to TCEQ and USEPA in May 2005.

Sonny Rayos expressed concern that he does not have expertise on the LTMO process and feels that he needs time to gain confidence in the method before agreeing with it. Sonny asked whether LTMO would be implemented off-post. Kimberly Vaughn explained that LTMO would only be implemented on-post beginning in December 2005, with TCEQ's and EPA's approval. Off-post LTMO recommendations would be implemented after regulatory approval and after off-post well owners have been informed of the change to the monitoring program. Sonny indicated that he would likely approve the on-post implementation of the LTMO recommendations before the December monitoring event, but he will not approve the off-post implementation until he has had a chance to learn more about LTMO.

2. SWMU B-3 REMEDIAL ACTION DATA QUALITY OBJECTIVES (DQOS)

Brian Vanderglas led the SWMU B-3 removal actions and bioreactor construction and testing discussions. A brief introduction was presented on the site history, previous data results, and the current site condition (Slides 14-27). The main discussion points are broken down below.

Sampling Frequency Discussions

A sampling frequency of 1 sample/500 cubic yards (CY) of excavated material was proposed in the slide presentation; however, Abigail Power indicated that characterization sampling is usually performed at a rate of 1/200 CY for this type of work. Abigail Power also stated that there is some flexibility on the sampling frequency, as long as TCEQ is kept in the loop on any pertinent decisions.

Glaré Sanchez referred to Slide 17 for sampling frequency, which summarized previous site results that either exceeded or potentially exceeded hazardous levels using the 20 times rule. Glaré stated that material excavated from areas that did not exceed or

potentially exceed hazardous levels could be at 1/500 CY, and the areas that exceeded or potentially exceeded could be sampled at a greater frequency of 1/200 CY. TCEQ was agreeable to this sampling approach for waste characterization. The waste characterization samples would be collected *ex situ* from excavated material stockpiled inside the SWMU B-3 boundary.

Brian Vanderglas stated that no excavation bottom samples are planned after the excavation of material is complete and before the bioreactor is constructed (Slide 29). The bioreactor will be designed to treat groundwater recirculated from CS-MW16-LGR in addition to its underlying and surrounding material and it is anticipated that the groundwater being recirculated through the bioreactor would contain contaminants of concern (COCs). As such, no over-excavation into the native materials is planned and collection of samples would not provide any relevant data for site closure or for evaluating bioreactor performance. TCEQ agreed with this approach.

Area of Contamination (AOC) Concept/WMP Discussions

Sonny Rayos questioned how hazardous waste would be handled. Ken Rice explained that the AOC concept will be used, keeping the waste within the site boundaries for waste characterization and if necessary, treatment to non-hazardous levels for subsequent off-site disposal. Ken also explained that materials would be segregated into separate stockpiles if they deviate from the waste description, so that these materials can be characterized separately and non-hazardous materials and/or exotic materials are not mixed with potentially hazardous materials.

TCEQ pointed out that the WMP should be finalized before these actions are implemented, but pointed out that they usually would not provide any official concurrence or approval of the plans. Ken Rice specifically requested that TCEQ review the revisions to the WMP made in response to the TCEQ comments. TCEQ agreed to review the WMP.

Exotic Material Discussions

TCEQ stressed the need to separate exotic materials during excavation. TCEQ also stated that site-specific addenda should be completed for sites where new types of exotic material are encountered. Parsons and CSSA agreed.

Injection Permit/Pumping Test Discussions

Brian Vanderglas explained the selection criteria for the injection zone and stated that the injection permit was being submitted to TCEQ and that Parsons was working with Bryan Smith to assure compliance with permit requirements. Brian also explained the pumping test details.

3. WMP

Glaré Sanchez and Ken Rice led the WMP discussions (Slide 36). Glaré described CSSA's draft responses to the WMP comments from TCEQ; Sonny did not object to any of the responses. Parsons and CSSA would like TCEQ's agreement on the WMP before the B-3 removal action begins. Sonny Rayos brought up the ash layer at AOC-55 that was not separated during sifting activities at the site. Ken explained that it

was not technically feasible to separate the ash from the other buried waste materials based on the site characteristics and presence of unexploded ordnance (UXO) which required all of the debris to be sifted before waste characterization testing.

Ken Rice explained how the 20x rule has been used as a screening tool for waste characterization since *ex situ* toxicity characteristic leaching procedure (TCLP) samples are collected to determine disposal requirements. Sonny Rayos expressed his concern that the 20x rule not be used exclusively, but coupled with TCLP results as described by Ken.

4. TRRP TRANSITION

Julie Burdey presented the TRRP discussions. Julie explained that 30 additional CSSA SWMUs and Areas of Concern (AOCs) will be addressed under TRRP and presented slides with a summary table listing each site (Slides 37-41).

Julie Burdey discussed sites that were submitted for delisting or closure under Risk Reduction Rules (RRR), but still have outstanding issues (Slide 42). Discussion focused on AOC Coal Bins and SWMU B-14, both of which were recommended for delisting. A letter was sent to TCEQ requesting delisting of the sites, but no response was received. Sonny Rayos says he will check his database for the letter, but asks for the letter to be resubmitted. Jorge Salazar commented that he remembered a letter concerning the Coal Bins site and he would try to locate it.

Discussions ensued on the method to close CSSA SWMUs and AOCs under TRRP (Slides 46-47). The basic questions are:

- Will each site will require a separate Affected Property Assessment Report (APAR)?;
- Can sites that have no completed work to date be remediated and closed without going through the complete APAR process?;
- Can sites that are located near each other be combined into a single APAR?; and
- Will site-specific ecological assessments be necessary or can a post-wide assessment be used?

Sonny Rayos states that under TRRP Remedy A, a site may be closed by submitting a self-implementation notice (SIN), cleaning the site to applicable TRRP criteria, then submitting a Response Action Completion Report (RACR). Sonny then explains that under Remedy B, the full APAR process is required. Sonny then stated that he prefers the ecological assessment be post-wide rather than site-specific, but that he needed to check with the TCEQ's ecological team to make sure that a post-wide ecological assessment would be acceptable to them.

Julie Burdey explained the planned approach for prioritizing sites for entering the TRRP process (investigations, response actions, and closures) to TCEQ (Slide 43). Glaré Sanchez offered to include TCEQ in the prioritization decisions, but Sonny Rayos said he would rather that CSSA and Parsons determine the prioritization.

Sonny Rayos closed the discussions on this topic with the comment that he would like to be flexible to do the best thing for the environment while still staying within the TRRP closure regulations.

FOLLOW-UP ISSUES AND ACTION ITEMS

- Modify WMP to include issues discussed in meeting. Follow-up with TCEQ for their concurrence on the plan.
- Follow-up with Sonny Rayos and Jorge Salazar as to whether the AOC Coal Bins/SWMU B-14 delisting letter can be found at TCEQ. If it cannot be found, resubmit letter.
- Check on whether TCEQ would allow for a site-wide ecological risk assessment rather than site-specific ones.

Attachment 1

Meeting Agenda

Location: CSSA

Date and Time: October 13, 2005, 1000-1200

- Groundwater Long-Term Monitoring Optimization Recommendations Overview
(*LTMO Evaluation was submitted to TCEQ on May 18, 2005*)
- Planned SWMU B-3 Work
 - Removal action
 - Bioreactor installation
 - Preliminary Westbay data
- Waste Management Plan Status
- Transition to TRRP for future CSSA SWMU closures
 - Summary of remaining sites
 - Approaches to closing sites (self-implementation, eco-risk, groundwater, combining sites)
 - Prioritization considerations

Attachment 2
Slide Presentation

Attachment 3

Meeting Hand-outs