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**USACE PBOW TEAM  
MEETING MINUTES  
PLUM BROOK ORDNANCE WORKS  
Thursday December 11, 2014  
USACE Construction Trailer**

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**ATTENDEES**

Rick Meadows, USACE Huntington  
Lisa Humphreys, USACE Huntington  
Jim Beaujon, USACE Nashville  
Paul Jayko, OEPA NWDO

Steve Downey, CB&I  
Mike Gunderson, CB&I  
Lana Wood, OTIE  
Helen Owens, OTIE

**TEAM MEETING AGENDA**

1. Review of RAB Meeting Agenda Items (Team)
  - a. Reservoir No. 2 Burning Ground RA-C (OTIE)
  - b. Acid Area 2 RA-C (OTIE)
  - c. Well Abandonment (CB&I)
  - d. Status of Acid Area 3 RA-C Award (USACE)
  - e. Status of Projects in RI/FS Phase (CB&I)
2. Status of NASA including Groundwater Land Use Controls Language in the Master Plan (Bob Lallier, NASA)
3. Status of the Memorandum of Agreement / Memorandum of Understanding (NASA/USACE)
4. Status of Ohio EPA Concurrence Letters(OEPA)
  - a. TNT A PCO
  - b. Groundwater NFA Decision Document
  - c. Acid Area 2 Decision Document
  - d. Acid Area 3 Decision Document
5. Review of Action items
6. Open Topics
7. Schedule Next RAB Meeting

**REVIEW OF RAB MEETING PRESENTATIONS**

Team Members reviewed their presentations for the RAB Meeting.

**Reservoir No. 2 Burning Ground**

Helen Owens (OTIE) distributed the handout material that summarized the scope of the R2BG project and reviewed the activities that are underway in R2BG. The handout materials are included as an attachment to these minutes.

During the review of the R2BG presentation, Steve Downey, CB&I reminded the team of a previous discussion to include the costs for remediation pad and sump area restoration activities in the cost-to-complete estimates. The restoration would be necessary at the completion of all the RA-C efforts at PBOW to restore the pad and sump areas to their pre-RA-C conditions.

### ***Action Item***

- Include the treatment pad/sump area restoration activities in the Cost-to-Complete estimates. Costs may be assigned to PRRWP project because it will most likely be the last RA-C using the Alkaline Hydrolysis process – Lisa Humphreys

Rick Meadows (USACE) suggested doing an evaluation to determine how much funding has been saved by reusing the site (remediation pad). The information could be used when doing briefings. No action items were identified for this topic.

### **Acid Area 2 RA-C**

Helen Owens (OTIE) will provide a brief overview of the project and update the RAB on the status of the work plans. Ms. Owens overview will consist of the following information:

- The contract was awarded in mid-September 2014
- Draft work plans are currently under USACE review with comments expected in mid-January 2015
- The volume of soil to be excavated is 14,189 cy
- The contaminant of concern is PCBs
- No soil treatment will be performed
- The soil will be excavated and disposed at the Erie County Landfill
- Use of a soil screening analysis to determine if the excavation depth can stop at 18 inches.

### **Well Abandonment and Lead Delineation Sampling**

Mike Gunderson (CB&I) distributed the handout for the presentation and then provided an overview of the Well Abandonment and Lead Delineation Sampling projects. The Well Abandonment is anticipated to be completed next week but backfilling and reseeded the sites will be completed in the spring 2015.

Mr. Gunderson provided an update on the status of the projects in WWTP No. 2, Acid Area 1 and the Sellite Area. As part of the update, Mr. Gunderson prepared a brief presentation on the TCLP procedure and how the data from the procedure is used. Mr. Gunderson's presentation is included as an attachment to these minutes.

### **Acid Area 3 RA-C Contract Award**

Lisa Humphreys (USACE) provided an update on the AA3 contract award. Ms. Humphreys said the solicitation has not been sent to the contractor (OTIE) and that it is currently under review in USACE's Office of Counsel. The contracting office anticipates that the solicitation package will be sent sometime next week. Contracting is undergoing an audit which has delayed issuing the solicitation.

For purposes of the RAB Meeting, Ms. Humphreys will inform the group that the solicitation is in contracting and waiting distribution of the final solicitation package to OTIE, followed by negotiations, and targeting a contract award by end of December, pending availability of funds.

### **Projects in the RI/FS Phase**

Mike Gunderson (CB&I) provided an update on the following project documents:

- WWTP 2 BERA
- WWTP 1 & 3 Proposed Plan
- Red Water Ponds Proposed Plan
- Red Water Ponds Decision Document
- Ash Pits 1 & 3 Proposed Plan
- Powerhouse No. 2 Ash Pits Proposed Plan
- Garage Maintenance Area Feasibility Study
- Acid Area No. 1 Proposed Plan
- Well Abandonment Report

Mr. Gunderson's presentation is included as an attachment to these minutes.

### **Additional RAB Topics**

Rick Meadows (USACE) expanded on a couple of agenda items for the RAB that were not on the Team Meeting agenda. They consisted of the continuation of the RAB activities and maintaining a duplicate copy of the PBOW Public Repository at the Sandusky Library. For the continuation of the RAB activities, USACE is required to ask the group (RAB) if they want to continue the RAB. Rick will pose the question to the RAB and have them coordinate their response with John Blakeman (RAB Co-Chair). Lisa Humphreys (and Helen Owens) will contact the Sandusky Library to find out if they would be able to house a duplicate copy of the Public Repository at the library in the historical reference section.

#### ***Action Item***

- Research the use of the Sandusky Library for the RAB Meetings, maintaining a duplicate copy of the PBOW Public Repository at the Sandusky Library, and coordination with John Blakeman on the disposal of draft PBOW documents – Lisa Humphreys

### **STATUS OF NASA INCLUDING GROUNDWATER LAND USE CONTROL LANGUAGE IN THE MASTER PLAN**

Bob Lallier was unable to attend the Team Meeting but updated the team by telephone. He said he was trying to schedule a meeting with the NASA attorneys regarding the language for use in the NASA Master Plan.

#### ***Action Item***

- Groundwater Land Use Control language for the NASA Master Plan – Bob Lallier

### **STATUS OF THE MEMORANDUM OF UNDERSTANDING (MOU)**

Bob Lallier, NASA had a scheduling conflict and could not attend the meeting. Rick Meadows has sent the draft language (that NASA provided to USACE) to USACE's attorney in Louisville (Barb Lollar) requesting her to begin developing language that USACE would like to see in the MOU. Ms. Lollar responded to Rick regarding the schedule and Rick told her the schedule showed it being completed by June.

#### ***Action Item***

- NASA language for the draft MOU – Bob Lallier

## **STATUS OF OHIO EPA CONCURRENCE LETTERS**

Paul Jayko, Ohio EPA informed the team that the letters were provided to Justin Burke (NWDO, Federal Facilities Section), Archie Lunsey (NWDO), and Shannon Nabors (NWDO, District Chief).

Rick Meadows said that Patty Bertsch found additional guidance in FUDSMIS on the process for documenting non-receipt of concurrence or non-concurrence letters. Rick briefly described the guidance and according to the guidance, if the regulator doesn't respond in 30 days, Rick is to notify Ms. Bertsch, who is then supposed to contact Ohio EPA to resolve the concurrence/non-concurrence issue. If that process is not successfully resolved, the issue is then forwarded up to Headquarters. Currently Ohio EPA has exceeded the 30-day response period for issuing the concurrence letters. Rick has provided the list of concurrence letters, the dates that concurrence was requested and corresponding due dates to Ms. Bertsch, and is awaiting an update from her.

USACE has delayed uploading the Acid Area 2 and Acid Area 3 Decision Documents to the database until the concurrence letters are received so the complete document packages can be loaded at one time.

Mr. Meadows asked Mr. Jayko that if USACE had Ohio EPA concurrence on the Groundwater NFA DD, would USACE need to get Ohio EPA concurrence on the Groundwater PCO? Mr. Jayko did not know the answer to the question. Mr. Meadows asked Mr. Jayko if USACE obtained Ohio EPA concurrence on the GW NFA DD and moved forward with closing out the GW project, and referencing the DD concurrence, would that be acceptable to the agency? Mr. Jayko responded that moving forward with the PCO, based on the concurrence of the NFA DD, may not be an issue with the OEPA reviewer.

Mr. Jayko confirmed that he did not have a timeline for issuance of the concurrence letters from Justin Burke.

### ***Action Item***

- Continue to pursue concurrence letters for each DD as well as the TNT A PCO from Ohio EPA – Paul Jayko

## **REVIEW OF ACTION ITEMS**

- Include the remediation pad site restoration efforts in cost-to-complete – Lisa Humphreys
- Research the use of the Sandusky Library for the RAB Meetings, maintaining a duplicate copy of the PBOW Public Repository at the Sandusky Library, and coordination with John Blakeman on the disposal of draft PBOW documents – Lisa Humphreys
- Groundwater Land Use Control Language in NASA Master Plan – Update – Bob Lallier
- NASA language for the draft MOU – Bob Lallier
- Concurrence letters from Ohio EPA – Paul Jayko

**OPEN TOPICS**

Several Public Meetings are scheduled in March 2015 (Acid Area 1, Ash Pits 1 and 3, and Powerhouse No. 2). The team discussed coordinating the Public Meetings with the RAB Meeting on the same evening. It was decided to have the three Public Meetings and the RAB on the same evening. The Public Meetings would include the presentation of the Proposed Plans (two of which are NFA) and the RAB agenda would be limited to project updates.

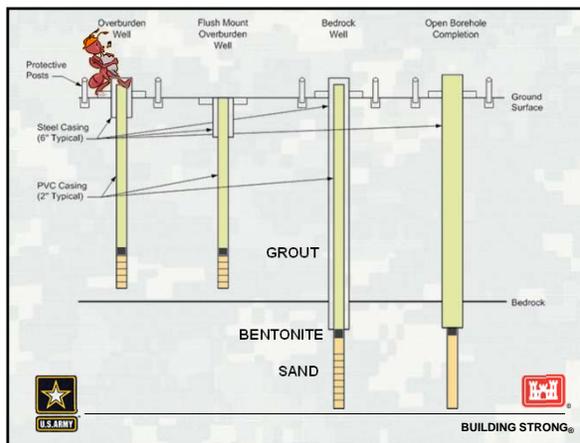
**SCHEDULE NEXT RAB MEETING**

The next Team Meeting, Public Meetings (3) and the RAB Meeting are scheduled for Thursday, March 26, 2015.



## Monitoring Well Abandonment Lead Delineation Sampling

Mike Gunderson  
Geologist  
CB&I Federal Services  
11 December 2014



### Well Abandonment Status

- ▶ Fieldwork completed in three stages
  - Sanding/bentonite added to wells (completed)
  - Grouting of well/borehole (completed)
    - ▷ Drilling subcontractor completed work with CBI oversight
  - Removal of surface material and site restoration
    - ▷ Protective casing/concrete/bollards removed
      - Excavate to 3-4 feet to access protective steel casing
      - In progress, to be completed in December 2014
    - ▷ Site backfilled and reseeded as needed
      - To be completed Spring 2015.



### Well Abandonment Status

- ▶ Diversion Stem for insertion of grout and diverting groundwater



**Well Abandonment Status**

► Grout Mixer/Pump



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**Well Abandonment Status**

► Removal of Surface Material



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**Well Abandonment Status**

► Grouted well



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**Well Abandonment Status**

► Surface Restoration – backfilling/grading in progress

- Top soil/seeding to be completed Spring 2015



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### Well Abandonment Status

- ▶ **Planned Activities**
  - Additional work to be completed in Spring 2015 – adding topsoil, seeding and grading
  - Additional site walk in spring / summer to verify growth of seeded areas, followed by additional restoration if needed.
  - Submittal of well closure forms to the Ohio DNR
  - Submittal of well abandonment report




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### Fieldwork Status

- ▶ **Toxicity Characteristic Leaching Procedure (TCLP) Sampling**
  - Typically collected during investigations for disposal of investigation derived waste and during remediation to deal with waste disposal
  - Analysis used to determine disposal requirements
    - ▷ Investigation Derived Waste
      - Decontamination water and purge water
      - Residual soil from drilling and sampling
      - Occasionally also sampling equipment, PPE, etc that may require disposal
    - ▷ Remediation waste (soil and groundwater)




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### Fieldwork Status

- ▶ **Additional lead sampling conducted at three sites in September 2014**
  - Waste Water Treatment Plant No. 2
    - ▷ Baseline Ecological Risk Assessment
    - ▷ TCLP sampling
  - Acid Area No. 1
    - ▷ TCLP sampling
  - Former Sellite Building Area
    - ▷ TCLP sampling and lead delineation




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### Fieldwork Status

- ▶ **Toxicity Characteristic Leaching Procedure (TCLP)**
  - Simulates landfill conditions
    - ▷ Conduct simulated leaching of the waste and potential impacts for long term disposal in landfills
    - ▷ Forty compounds evaluated based on toxicity
    - ▷ In addition, ignitability, corrosivity and reactivity also evaluated




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### Fieldwork Status

- ▶ Toxicity Characteristic Leaching Procedure (TCLP)
  - Method (soil)
    - ▷ Collect representative samples of waste material
      - Composite sample (non-VOCs) or discrete sample (VOCs) collected on a cubic yard or ton basis (e.g., one sample per 300 cubic yards of soil)
      - Minimum of 100 grams of composite sample added to pH-adjusted water
        - Amount of water is 20 times the sample weight
        - Agitated for 18 hours
        - Liquid extract analyzed for 40 compounds
          - If any of the established standards exceeded, the waste is considered hazardous




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### Fieldwork Status

- ▶ 20 Times Rule (Rule of 20)
  - Used for planning purposes only, not for actual disposal
  - Acid Area No. 1 issue
    - ▷ Lead is not a contaminant of concern at AA1 for exposure, but potentially is a disposal issue once soil is excavated for PCB contamination because lead exceeds the "20 Times Rule" of 100 mg/kg
    - ▷ Affects the anticipated costs for various alternatives developed in the feasibility study
    - ▷ Same issue at the Former Sellite Area where focus is on PCBs but lead is present as well
  - Waste Water Treatment Plant No. 2 also has lead exceeding 20X rule but lead is the COC




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### Fieldwork Status

- ▶ Evaluating Waste Disposal Costs in Feasibility Studies
  - Disposal costs (hazardous vs nonhazardous) important cost factor in the FS stage
  - TCLP samples typically not collected during investigation activities other than for IDW disposal
  - Use the "20 Times Rule" for solid waste
    - ▷ If the concentration of a given contaminant exceeds 20 times the TCLP limit, there is a *potential* for the waste to be classified as hazardous and require special disposal
    - ▷ Conversely, if the contaminant concentration is less than 20 times the TCLP limit, then the sample cannot leach enough of the constituent to fail the TLCP limit and thus is classified as a nonhazardous waste




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### Fieldwork Status

- ▶ Derivation of the 20 Times Rule
  - TCLP limit for lead is 5 mg/l in 2 liters of extract
    - ▷ Total mass is therefore 10 mg
    - ▷ Assumes that all lead has leached out of the 100 mg soil sample
      - Original soil concentration was therefore 10 mg lead in 100 gram sample = a concentration of 10 mg/0.10 kg or 100 mg/kg




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### Fieldwork Status

- ▶ Derivation of the 20 Times Rule
  - 20X Rule results in a lead concentration of 100 ppm for soil
  - Limitations
    - ▷ Assumes all lead would leach out of the sample
      - Very conservative assumption
      - Soil factors such as grain size, mineralogy and organic carbon content affect leachability and are not accounted for in the calculation
      - Even with these limitations, the 20X Rule very useful particularly if the concentrations of the contaminants of interest do not exceed the screening level




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### Fieldwork Status

- ▶ Waste Water Treatment Plant No. 2 BERA
  - Bioaccumulation study currently in progress to evaluate lead in soil
  - TCLP sampling completed
- ▶ Acid Area No. 1 and Former Sellite Building Area
  - TCLP sampling completed
- ▶ All TCLP samples were below standards indicating soil *likely* will be disposed of as a nonhazardous waste
  - ▷ Additional TCLP sampling required prior to actual soil disposal




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### Fieldwork Status

- ▶ 20 X Rule (continued)
  - Examples

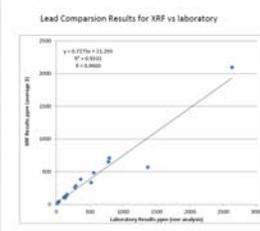
Contaminant	TCLP Regulated Level (mg/l)	20 x TCLP Limit
Arsenic (As)	5	100
2,4-Dinitrotoluene	0.13	2.6
Lead (Pb)	5	100
Vinyl Chloride	0.2	4




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### Fieldwork Status

- ▶ XRF Performance for Lead Analysis



Lab	WVW Sample ID
147	WVW-08-01
148	WVW-08-02
149	WVW-08-03
150	WVW-08-04
151	WVW-08-05
152	WVW-08-06
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519	WVW-08-12
520	WVW-08-13
521	WVW-08-14
522	WVW-08-15
523	WVW-08-16
524	WVW-08-17
525	WVW-08-18
526	WVW-08-19
527	WVW-08-20
528	WVW-08-21
529	WVW-08-22
530	WVW-08-23
531	WVW-08-24
532	WVW-08-25
533	WVW-08-26
534	WVW-08-27
535	WVW-08-28
536	WVW-08-29
537	WVW-08-30
538	WVW-09-01
539	WVW-09-02
540	WVW-09-03
541	WVW-09-04
542	WVW-09-05
543	WVW-09-06
544	WVW-09-07
545	WVW-09-08
546	WVW-09-09
547	WVW-09-10
548	WVW-09-11
549	WVW-09-12
550	WVW

### Document Status

**Steve Downey**  
Project Manager  
CB&I Federal Services, LLC  
11 December 2014





US Army Corps of Engineers  
**BUILDING STRONG®**

### Document Status

- ▶ Ash Pits 1&3 Proposed Plan
  - Draft Proposed Plan issued 1 December 2014
  - Comments requested by 2 February 2015
  - Public Meeting – March 2015
- ▶ Powerhouse #2 Ash Pits Proposed Plan
  - Draft Proposed Plan issued 2 December 2014
  - Comments requested by 2 February 2015
  - Public Meeting – March 2015
- ▶ Garage Maintenance Area Feasibility Study
  - Internal Draft – 15 December 2015




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### Document Status

- ▶ WWTP2 BERA Report
  - Internal Draft – February 2015
  - Results to be included in Draft RI Report
- ▶ WWTP 1&3 Proposed Plan
  - Currently resolving internal review comments on CX-draft
  - Draft Proposed Plan – January 2015
  - Public Meeting – May 2015




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### Document Status

- ▶ Acid Area No. 1 Proposed Plan
  - Draft Proposed Plan issued 17 November 2014
  - Comments requested by 20 January 2015
  - Public meeting – March 2015
- ▶ Well Abandonment Report
  - Internal Draft Report – Summer 2015
    - ▷ Well abandonment forms to be submitted to Ohio DNR January 2015




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### Document Status

- ▶ Red Water Ponds Proposed Plan
  - Public Meeting – 20 November 2014
  - Public Comment Period ends 22 December 2014
- ▶ Red Water Pond Decision Document
  - Internal Draft – January 2015
  - CX Draft – April 2015
  - State Draft – June 2015




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