

## MEETING MINUTES

Team Meeting  
Plum Brook Ordnance WorksOhio EPA Southwest District Office  
Dayton, Ohio

November 20, 2002

ATTENDEES

Rick Meadows, USACE Huntington District	Laurie Eggert-Moore, OEPA SWDO
Lisa Humphreys, USACE Huntington District	Bonnie Buthker, OEPA SWDO
Linda Ingram, USACE Nashville District	Dave Kessler, SHAW (By Teleconference)
Lannae Long, USACE Nashville District	Steve Downey, SHAW (By Teleconference)
Jim Beaujon, USACE Nashville District	Mike Gunderson, MACTEC (By Teleconference)
Ron Nabors, OEPA NWDO	Helen Owens, ICI - Contractor

Reid  
3 Feb 2003*Meeting Objectives*

The objective of this meeting with Ohio EPA and PBOW Project Team members was to review the ongoing and planned activities at the site. Also, USACE presented strategies to address issues regarding the excavation in TNT Area B, risk assessment factors, and groundwater background and offsite levels.

*TNT Area B Removal Action*Designation of Exposure Units

One of the concerns presented by Ms. Lisa Humphreys was the wide variance of analytical results between the field screening method and the off-site laboratory (confirmation samples), and the application of Remedial Action Objectives.

During excavation the exposed surfaces of the excavated areas were sampled and analyzed to determine approximate levels of contamination in the soil and the individual surfaces (walls and floors). There were incidences when the field test methods indicated the contaminant levels in a specific exposure unit (wall, floor) were below the RAOs. Samples of the same areas were sent to the laboratory for confirmation analysis and the results indicated contaminant levels higher than the RAOs and the removal of additional soil took place. The excavation of additional soil resulted in designated areas becoming "joined" due to the removal of the soil wall between the two areas or continuing excavation to reach "clean" soil. Both situations contributed to the generation of a larger volume of solid waste than originally planned. Currently most units are below the RAO approved in the Feasibility Study.

## OEPA guidance:

- An exposure unit (EU) may be defined as a continuous hole. If 2 or more excavation holes become one, the resulting larger hole is considered the exposure unit.
- The existing confirmatory sample results of an EU shall be used to demonstrate compliance with remedial goals.

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- If a chemical of concern (COC) maximum concentration and/or 95% upper confidence limit (UCL) of an EU is less than the RAO, no further excavation is needed.
- Each EU must be  $HI \leq 1$  and  $ILCR \leq 1E-5$ .

#### TNT Area B for Closure Report

- **ACTION ITEM** – OEPA will review confirmatory sample data and summary prior to backfilling in TNT B. USACE will send (electronic mail) to OEPA, a summary of chemicals of concern (COC) statistics, include minimum, maximum, and/or UCL; HI; and ILCR for each EU.

#### TNT Areas A and C Remedial Investigation /Feasibility Study (RI/FS)

- Before specifying an RAO, determine the laboratory capabilities in establishing the detection limit
- The OEPA suggested that RAOs be site-specific for each area of concern
- USACE will define each RAO to be greater than a detection limit and cumulative  $HI \leq 1$
- OEPA advised whatever soil contamination is left behind, assure it will not contaminate groundwater (USACE will evaluate groundwater in the groundwater Remedial Investigation (RI))
- RAOs will be developed for each nitroaromatic COC, including separate aminos and DNTs
- **ACTION ITEM** – USACE will document the discussions in this meeting and provide a copy of the minutes to OEPA,

#### *Determination of Background Concentrations of PAHs*

- Using available soil data and additional soil sampling data, demonstrate “localized” background concentrations of PAHs.
- Use available background information to support  $RAO=1$  ppm in soil (for total COC PAHs)
- Background concentrations should be site-specific outside of area of concern
  - Must not screen out PAHs through background comparison
  - Can use PAH background concentration on the backside of risk assessment for perspective of site-related and regional levels of PAHs
- **ACTION ITEM** – Shaw/USACE will notify OEPA of PAH background sampling locations if they do exist (check TNT A and West Red Water Pond data sets for possible PAH background). In Feasibility Study, USACE/Shaw will provide write up for justification of 1 ppm COC PAHs in soil as a management decision.
- There should be approximately 10 surface soil samples collected for PAH background concentrations to be used at all AOCs. OEPA will approve PAH background locations.
- Concerned only with “surface” PAH concentrations
- Surface sample depths for PAHs should be consistent with the depth of other surface samples

#### *Groundwater*

- It was agreed to utilize existing groundwater background data for PAHs and BTEX just as they are handled in soil
- Introduction of additional Team Members to meeting via teleconference
  - Dave Kessler (Shaw)
  - Steve Downey (Shaw)
  - Mike Gunderson (MacTec)
- Unable to collect low-flow samples from MW-01, MW-20, MW-24, and MW-27 (Shaw)
- Concerned with contamination from MW-27 (Shaw)

- Low-flow sampling is the preferred method for groundwater sampling, however using data from samples collected with a bailer is approved but must be evaluated for appropriateness and also discussed in the Risk Assessment
- Nitroaromatics detected in BED-MW-25 (0.12 ug/L), does this exclude the use of BED-MW-25 for PAHs and metals to establish background levels.
  - OEPA – Collect more data on the well, evaluate based on groundwater flow

**Review of OEPA Comments on the Report "DRAFT – First Annual Data Summary and Evaluation Report"**

- **ACTION ITEM** – for clarification on the comments, OEPA requested that USACE email questions about comments to John Weaver, OEPA Northwest District Office (NWDO) and copy Ron Nabors (NWDO) on the correspondence to Mr. Weaver.
- OEPA – approval to use private wells as screening tools, but cannot use private wells as permanent monitoring wells.

**Other Discussions**

- Review of FY03 Activities
  - Propose funding to determine nature and extent of plume
  - Determine existing groundwater data needed to complete FS in Red Water area
- **ACTION ITEM** – OEPA (Ron Nabors) provide information on pump and treat technologies in the Sandusky area
- Landfill Issues
  - OEPA – Waste material generated from the TNT Area B removal is regulated as a solid waste
  - USACE is responsible for manifesting soil as solid waste in accordance with OEPA regulations. Erie County Landfill is disposing of the TNT Area B solid waste as approved.
  - USACE will dispose of up to 300 ton per day in the Erie County Landfill, once the daily limit (established by Erie Co. Landfill) is met, USACE will dispose of material in an alternate site (Ottawa County Landfill)

*Show to our in-house folks get these. Checked 3 Feb 03. 25'*