Crysler, Ruby

From: Krause, Michael <michael.krause@aecom.com>
Sent: Thursday, July 07, 2016 11:54 AM
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Subject: June 21 EPA/KDHE meeting minutes
Attachments: 21JUN16_Regulator Project Status Meeting Mins.pdf

Follow Up Flag: Follow up
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All,

Please find the attached minutes from the meeting held on 21 June at EPA region 7. Let me know if you have any questions or comments.

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McConnell AFB PBR
Project Status Meeting Minutes

Meeting Date: 21 June 2016

Meeting Time: ~0900 to 1230 hrs

Participants:

Ruby Crysler, EPA
Jeff Johnson, EPA
Jacqueline Grunau, KDHE
Brian Wight, URS Group, Inc.
Mike Krause, URS Group, Inc.
Chung Yen, AFCEC (phone)
Cole Knight, McConnell AFB (phone)
Sheldon Blair, McConnell AFB (phone)
Mark Wichman, USACE (phone)
Andrea Sampson, USACE (phone)

These minutes document the discussions during the McConnell Air Force Base (AFB) Performance Based Remediation (PBR) project status meeting held from about 0900 hours to 1230 hours on 21 June 2016 at Environmental Protection Agency (EPA) Region 7.

The group discussed the progress of the in situ chemical oxidation (ISCO) interim measures implemented at two sites in the fall of 2014 and the path forward for those sites. The discussions focused on whether or not the performance monitoring data collected to date confirm that the pneumatic fracture emplacement (PFE) of oxidant at each site and subsequent mitigation injections have been successful in distributing the oxidant in the subsurface and that treatment was occurring. If so, EPA and KDHE are willing to use the RCRA First process to move directly to preparing a statement of basis (SOB) that includes PFE of oxidant as the remedy for the site. No corrective measures study (CMS) work plan or CMS would be necessary for those sites. URS would need to complete a Remedy Proposal Memorandum (RPM) using the outline EPA, KDHE, and URS have been preparing. Two key elements of the RPM are identifying the trigger levels for implementing mitigation activities and defining when the corrective action is complete.

SS001: Spill Site 1

- URS will find out the status of the replacement well for MW25R.
- Another round of mitigation injections upcoming in the vicinity of MW29 and MW30. Mitigation injections will be completed through direct push rods.
- Will wait for another round of sampling before determining in mitigation injections will be completed near MW6 and/or MW27
- Will continue to watch the benzene concentration in MW11 for now, as this well is in the reductive treatment zone and the TCE concentrations are decreasing.
- Will complete the LTM sampling prior to completing the mitigation injections. Will issue the mitigation injection TM at least three weeks prior to beginning the work.

- Agreed to move forward with the Remedy Proposal Memo (RPM) and Statement of Basis (SOB) for the site including both ISCO and ISCR remedies. Remedies will be condition dependent

Landfill 34: (MAFB 163-Former Municipal Landfill)

- Need data from the new TPH method prior to preparing the RPM and SOB for the site
- Will need a lead in paragraph included in the IM PM reports describing why two TPH methods are being used
- URS will check on the status of the VC in the northern portion of the site
- It's okay to abandon the IM injection wells, just give EPA and KDHE a heads-up before hand

OW041: Building 9

- Reviewed the water level data collected from new monitoring wells MW6 and MW7.
- Chemical data is not yet available
- No additional monitoring wells at this time, will review again once the chemical data is received

SS548: Building 971 Diesel Fuel Spill

- Proposed locations of MW11 and MW12 are acceptable
- Generate data gaps report prior to IM implementation
- Data will be collected for both the new and old TPH methods and the data discussed prior to IM implementation

FT006: Fire Training Area 6 Toluene Delineation

- Existing data for toluene in soil data was presented and discussed
- Likely excavate toluene impacted soil and add an amendment in the excavation prior to backfill to help address the dissolved phase
- RPM needs to include all SWMUs associated with the site

OW627: Building 1304 Former Pesticide Storage Area

- URS will add the PRG source to the table footnotes
- URS presented tables showing the residual site risk if all points above the screening level were excavated and if no excavation was completed at all
- URS will propose a limited excavation in the hottest areas and run a risk assessment on what remains
- This analysis will be included in the investigation report

Base Wide LTM Plan Working Copy

- URS will add a mitigation discussion in Section 2
- The plan will be titled Base Wide Groundwater Monitoring Plan
- In the performance monitoring section, URS will add (with stakeholder agreement) to the bullet referencing semi-annual sampling
- The plan update section will be revised to indicate that the plan will be reviewed on an annual basis and updated as necessary
- Tables will not be numbered and will include a revision number and revision date
- Sites with both ISCO and ISCR will be included in Section 2 Tables for both, with a reference to the other Table. In Section 4 the ISCR sample summary, timeline and figure will be shown separately form the ISCO sample summary, timeline and figure
- The plan will not include the 2016 injection sites at this time
- The VOC lists will be defined in Section 3
- URS will compare the Full, LTM, and IM PM VOC lists and make a recommendation for reducing the number of VOC lists
- URS will add a master list of Tables and Figures on the fly sheet for Section 4
- URS will insert a Section 5 that will initially be reserved for future CMI for Selected Remedy
- A very focused CMI WP will be necessary in the future to include O&M and triggers for mitigation

Field Schedule Email Format

- The new format for the weekly schedule email provides the additional information necessary for now

Remedy Proposal Memo Outline Status

- URS revised the Threshold and Balancing criteria to match those defined in the current permit
- Added the trigger levels for mitigation injections
- Added a section for Corrective Action completion
- Will try to have a working copy ready for review at the next meeting

OT547 Quarterly Sampling Schedule

- Call the two areas North and South for the purpose of reporting the data gaps study and for the IM injections
- Going forward with IM PM reporting the site will be reported under one cover, but data will be tabulated separately for the North and South areas

2016 Pre-Design IM Tech Memo Status

- EPA and KDHE stated that a general deficiency in the technical memorandum (TM) deliverables is a clear description of where and how the data will be reported
- EPA will get back to us regarding specific comments on this TM

LF011 ART Wells Decommissioning

- It is acceptable to EPA and KDHE that the ART wells are abandoned and not replaced

OW545 Schedule – 18 July 2016

- EPA and KDHE agreed that as data comes in from the investigation that we will need to have discussions and decisions will be made in a short period of time

QC Samples

- Need to check that the QC samples are not weighted to one site – distribute across all sites
- Each site needs to have at least one QC
- Discuss data issues in the body of the report, not just the appendix and explain why no QC data was collected at a site during an event

Documents Priority List Review

- EPA and KDHE agreed we should recall the yellow and green highlighted items in the Document Priority list using a separate recall memo for each item
- Consider the RCRA Process streamlining TM complete
- Remove the color from the Draft Path forward TM and the TU601 Draft RFI report

SS544 SWMU 207 RFI Report Status

- EPA and KDHE both are continuing to review the RFI report and will have comments shortly

Base Wide Background Metals Study Status

- The manganese data includes temporary well data that may be a one time sample point with no trend
- EPA would like to see NOVA testing of the data to determine if the data is parametric or not
- A meeting will be scheduled with the appropriate participants to discuss the issues

Other

EPA said that to achieve their approval for site closure, they would need to see up to three years of monitoring data with concentrations below the agreed upon level. The duration is dependent on specific site conditions.

The next meeting will be held on 12 July 2016 at EPA Region 7 and potential topics include a review of the IM WP, new OWS data, Remedy Proposal Memo working copy, or investigation reports.