ROUTING AND TRANSMITTAL SLIP

Date 5/15/90

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Geoff Kany	GJK	5/17
2. Jeff Ingalls		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate	X	For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

- Attached are Debbie Robinson's notes from an April 30 meeting with Mapco to discuss status of closure & RPI activities.
- She has sent Rich Cormack a copy.
-

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Irene Alexakos	Phone No.

5041-102

GPO : 1987 O - 196-409

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

4/30/90

EPA / MAPCO Meeting

1:30 pm

AK0701
4/30/90
Sf

Name	Representing	Phone#
Deborah Robinson	EPA	442-0684
DAVID TETTA	EPA	442-0695
Joan Shirley	EPA - Office of Regional Counsel	(206) 442-09
Randy Jones	MAPI - General Counsel	(918) 599-373
Kathleen McCullom	MAPI	907-488-274
Bill Adams	EPA.	(206) 442-2806

FILE COPY

RECEIVED
MAY 16 1990
Department of Environmental Conservation
Solid & Hazardous Waste Section

IMAGED

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ACTION

- ☐ Lagoon B closure - Want to dispose sludge as non-RCRA waste.
- ☐ Can this site be clean closed?
- ☐ Do EPA + Mapco have agreement on whether RFI covers product plume as well as GW contam from RCRA units? See notes

4/30/90 Mapco / EPA meeting

- Jerry Fritz not here → in hospital. Went ahead w/this mtg rather than rescheduling
- Community luncheon did not take place 5/11 or 5/17 → new date.
- HANDOUT: 2 summary sheets
  RFI schedule
  Documents submitted to EPA

- Document sheet describes 1989 activities.
- Appt w/ Rich Cormack Wed. - give him documents, bring him up to speed. Will submit stuff directly to him
  - PRODUCT RECOVERY / GW REMED - Mapco sends stuff to Pete McGee
  - EPA RCRA stuff to EPA + Rich.

☆ Description of current conditions is good summary
Lagoon B is out of service - end Sept.
Sampled sludge - still in lagoon
Results are in CP
Plan to deal w/ sludge this summer
Tank 192 was replaced.
Mapco will submit inspection reports w/ cl certif
Sludge sample results are in CP
Sumps
Have inspected & cleaned. Now analyzing sludge
Boneyard
Have done > 20 borings. EPA has ~~Mapco~~ soil results. Plan to do a few more shallow borings in boneyard.

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Since 5/88 - have been doing 1/4ly GWM of wells near units.

In May, will do monitoring. Judith Papesh of PRC will be there (CME). Will choose deep wells below permafrost shallow wells next to units, shallow wells on boundary. Rich will be there too. Tentatively 5/22.

Probs w/cold weather sampling - exhaust probs w/in tent → get hits that aren't there when tent is gone. Affects samples taken w/bailer, not samples taken w/dedicated pumps.

1990
- Sample in May
- Sample boneyard
- Remove lagoon sludge, pull liner - dispose
- Closure certif. scheduled for September
- Summation of RFI in OCT.

COMMUNITY BRIEFING:
Selected 8 people from N Pole community
- Pharmacist, doctor, mayor, realtor, eye doctor, local bar owner.
- Plan a luncheon: Slide show explaining the industrial processes, EPA's rules, what went wrong, what they are doing. Incl GW remediation.

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20 min. presentation.
- Annual Luncheon as described
- 1/4 ly newsletters.

Expect questions. The people are familiar w/the refinery. Several have already had tours. Let them know what's going on + get them to come w/ questions.

Selection criteria:
Contact w/ N Pole Community
Wide range of professions

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* Plans for next year depend on EPA's response to CP. Need response very soon - in order to do work during summer months.
Havent sampled boneyard - need silt thawed in order to sample.

EPA has competing priorities.
Mapco raised PN time. If don't do work by Sept, will have to do it next year. Also suggested breaking out some of the closures.

GOAL: Get everything clean closed. Get generator status rather than permit status. Move Fast.

Mapco wants: - Direction that CP is basically OK
- To know when PN will be.
EPA said: You could choose to do some closure activities - taking the risk that more work will be needed later.

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Closure Plans Summary

2/90 was a 2nd submittal.
Dave said - in the best circumstances, it would take us 4-6 months to approve.

Tank 192 -

Cleaned in 9/88
Tested sludge - nonhaz. Disposed as solid waste. Sludge had benzene. Disposer burned them dispose remainder in municipal LF.
Cleaned, inspected - back in service.
Later dismantled + replaced. 7/89

Monitoring well.
No sampling of soil/pavement around tanks
Integrity tested - no leaks
Influent/Effluent thru pipes.

BONEYARD

Stored drums (unlabelled, bad aisle space)
Removed barrels
Staging area of contr. equip now.

Drilled 20+ borings in boneyard + analyzed 8010, 8020
GW M wells in boneyard 601/602

Plan to sample surface silt @ 6 locations in the boneyard 8010/8020
No indication of leaks or spills.

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Chose parameters by facility knowledge:
MEK, 111 TCE (Navy solvent)
BTEX

↳ wkd w/ Bill A. Started w/ whole suite of anal. + worked down to targets.
Worked w/ EPA on sample plan in the past.
Used outside contractors (Tetra Tech)

Barrels were stored in 2 areas of bone-yard - N end + S end. Borings are concentrated in those areas. There is benzene, BTEX in the GW. Product plume just E of there.

LAGOON B

Taken out of service last Sept
Sludge still there
3 monitoring wells around it & only sampling
Soil samples from: 1 boring + the 3 wells
Sludge tested. Results in CP. No cl HC's, low levels BTEX, no metals, FLASH (need to solidify to get rid of it)
> 0.5 ppm benzene in 2 of the samples

↳ Not regulated now, but will be under TCLP??
Would like [illegible] last so they won't be a Lge Quantity Generator. Intend to handle the Sludge this Summer. (Dispose as non-HW)

It was the chlorinated HCs, NOT BTEX, that made the SI a RCRA unit. They didn't find chl HC

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in the sludge.

4 Sumps - Part of oily water sys that carried Navy brand solvent
GWM wells } next to each sump.
Soil samples } HIGH BTEX/benzene
Cleaned + steamed each sump -
accum 6 barrels of sludge. Now being analyzed. Will need to be disposed.
Found low levels of MEK + chl HC - inconsistent + "wierd". (GW.) None in most recent samples
Soils: "Wierd" hits of acetone (suspect lab contam)) trace amts MEK.

Sumps are back in use.

For each sump: 2 borings, sampled every 2½' to 20'.

Past discussions about relationship between product recovery + RCRA closure + RCRA corrective action:
Demonstrate % contribution of RCRA units to already existing GW contam.
Corrective action Order: defers PC permit, addresses whole site.

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GW Remediation Target

MCL's Benzene 5ppb

Plan in the future to get ACL's from ADEC/us.

→ Does the RFI include product plume? Does everyone agree

Bill - ID all releases of haz const. on whole site

Randy → Question of origin: - waste disposal
- processing

Repeat the point: Separate contam from waste disposal from Contam. from processing.

Closure of units: a Order: Get EPA agmt.

Charac. + cleanup of all GW: h Order. Expect future negotiations on GW cleanup.