

McClellan AFB Restoration Advisory Board (RAB)

Meeting Minutes

July 23, 1997

6:30 p.m.

Vineland Elementary School

RAB Members Attending: Chuck Yarbrough, Community Co-Chair; Elaine Anderson, McClellan AFB Co-Chair; Randy Adams, Department of Toxic Substances Control; Alex MacDonald, Regional Water Quality Control Board; Del Callaway; Bill Gibson; Dennis Green; Joe Healy, U.S. Environmental Protection Agency; Jeannie Lewis; Bill Shepherd; Dennis Lewis

RAB Members Not Attending: James Bryant; John Leuthe; Susan McKee; Cody Tubbs; Sheila Guerra; Simeon Okoroike; Peter Berghius; Brad Gacke; Mannard Gaines; Ben Norman; Sue Sher

Alternates Attending: Dennis Lewis

Others Attending: Barry Bertrand, NARFE; Glen Del Sarto, SRCSD; Victor Auvinen, Radian International; Jamie Cameron-Harley, McClellan AFB; Craig Burnett, McClellan AFB; Kevin Wong, McClellan AFB; Jerry Vincent, McClellan AFB; Sudhadar Talanki, URS; Adam Harvey, URS; Kenin Poffenbarger, URS; Frank Miller; Ron Hergenrader, Jacobs Engineering; Rich Howard, Jacobs Engineering; Rick Blank, LAW Engineering and Environmental; Gerhard Blauth; Kim Emerick, McClellan AFB; Lee Lewis, Foster-Wheeler; Sandra Lunceford; Charles Mathies, Mather RAB; Jeff Morris, CH2M HILL; Phil Mook, McClellan AFB; Bert Gross, McClellan AFB; Margaret Gidding, McClellan AFB; Stephanie Benedict, Radian International; Kerri Melugin, Radian International

ACTION ITEMS

Status	Action Item	Champion	Time Frame
<i>PREVIOUS MEETING</i>			

Open	Report back to RAB on the outcome of the discussion of the GWMP	Technical Report Committee members	Next RAB meeting
Closed	Follow-up with CR committee on issue of microfilm reader	Kevin Wong	June 18 CR Committee meeting
Closed	Explain cost of new microfilm reader (for comparison)	Kevin Wong	Not specified; June 18 CR committee meeting
Closed	Explain costs of IR in the 1980s	Margaret Gidding	Not specified; June 18 CR committee meeting
Closed	Explain how proposals from potential contractors are objectively scored in the contract award process (question from public member)	Elaine Anderson/EM	In RAB meeting minutes
Closed	Explain in more detail the costs for Radian's support of the Admin Record	Kevin Wong	Minutes of 4/23 meeting
Closed	Discuss mailing list for OU E-H residents with Sheila Guerra and CR Committee	Margaret Gidding	Not specified; June 18 CR committee meeting
Closed	Provide costs of newsletter in minutes of RAB meeting	Margaret Gidding	Minutes of 4/23 meeting
Closed	Put security guard on Executive Session agenda	EM	June 5 Executive Session
<i>CURRENT MEETING</i>			
Open	Develop schedule of meetings for Reuse and Technical Report Committees	John Leuthe and Del Callaway	By 7 August Co-Chair Luncheon
Open	Members of Technical Report Review committee contact John Leuthe about meeting to prepare a committee mission statement	TRRC Committee members	By October RAB
Closed	Explore pros and cons of televising RAB meetings on cable TV	EM	ASAP
Closed	Find out what other military facilities are doing to remediate dioxin contamination	Joe Healy	By October RAB
Closed	Determine if someone from EPA's Quality Assurance group can brief the RAB on data quality assurance processes at October RAB	Joe Healy	Not specified

Closed	Mail copies of Dennis Green's slides to any RAB member who requests them	Jamie Cameron-Harley	ASAP
Closed	Invite Mr. Barry Bertrand to the next RAB Executive Session	Jamie Cameron-Harley	Before the 4 Sept. Executive Session Meeting
Closed	Invite spokesman from Sacramento Cable Commission to Executive Session	Chuck Yarbrough	ASAP

INTRODUCTION AND WELCOME

Mr. Chuck Yarbrough called the meeting to order at 6:30 p.m. He asked the RAB members to introduce themselves to the audience.

APPROVAL OF PREVIOUS MEETING MINUTES

Mr. Yarbrough asked for approval of the last meeting minutes. Ms. Jamie Cameron-Harley provided the following changes to the 23 April 1997 RAB meeting minutes:

- Page 7, paragraph 5 should read — "Mr. Yarbrough said that Boeing and AAI Corporation held open houses for McClellan AFB personnel."
- Page 8, paragraph 4 should read — "Mr. Dave Green said that a contractor recently did an asbestos survey, but McClellan has not completed any surveys on lead-based paint *for the industrial complex but has for housing.*"

Mr. Yarbrough moved to approve the minutes as amended, Mr. Green seconded. Minutes were approved unanimously.

Ms. Elaine Anderson announced that there will be a tour of the base for RAB members in September 1997. She encouraged the RAB members to feel free to let her or Mr. Yarbrough know if there are specific sites that they would like to see on the tour.

NEW BUSINESS

McClellan's Cleanup Systems

Ms. Anderson briefed the meeting participants on the cleanup systems. She explained that the Groundwater Interim Record of Decision (IROD) was signed in June 1995, with a phased approach. Phase I was to reduce data gaps around the base and to begin

containment of areas where contaminants in the groundwater exceed the Maximum Contaminant Levels (MCLs), which are the drinking water standards. Phase I is now complete.

Ms. Anderson showed a map that depicted data gaps, areas that have contaminated groundwater, and the areas that exceed MCLs. It showed where the Groundwater Treatment Plants were installed along the west side of the base and are connected to extraction wells on the north side of the base (Operable Unit D). Also three small treatment systems on the east side of the base has been installed.

Confirmed Site (CS) 24 has a mixture of contaminants in the groundwater. It has been determined that disposal of solvents in burial pits at CS 24 is the most likely source of contamination. (The mixture of contaminants in the groundwater is what distinguishes McClellan AFB from many Air Force bases.) A granular activated carbon system was installed for groundwater treatment around Building 621.

The plume located on the base boundary was beginning to migrate off base. It was predicted that the contamination would eventually reach the city wells if it was not contained. Although this area is not as "hot" as other sites on base, it does exceed the MCLs. The carbon treatment system that was installed has proven to be very effective and has captured the plume. (This is one of the sites that will be toured in September.)

Mr. Dennis Green asked how many treatment systems were there. Ms. Anderson said that there are several wells but there is only one activated carbon filter treatment system at CS 24.

McClellan is now in Phase II of the Groundwater IROD. This phase is now in design and is expected to be completed in 1998. The design will address capture in the remaining portion of the OU A plume. All systems for the containment of this groundwater plume should be in place and operating in early 1999. McClellan has focused groundwater cleanup efforts first on the areas that will result in the most benefit by containing groundwater contamination on base.

Soil Vapor Extraction Systems

McClellan has put several systems in place for the Soil Vapor Extraction (SVE) Program. Since the signing of the Engineering Evaluation/Cost Analysis (EE/CA) in 1993, quite a few actions and significant progress have been made across the base. Containment has been achieved along the west side of the base.

Investigation Cluster (IC) 23 is a good example of a source area in OU A. Paints, solvents, fuels, and oils were used in several buildings in IC 23. It has an estimated 2,000 pounds of volatile organic compounds (VOCs). This will be the first site where McClellan will be using flameless thermal oxidation to treat SVE off gas. (To this point McClellan has been using catalytic oxidation units to treat off gases and then moving to carbon treatment as the concentrations decrease.) Flameless thermal oxidation converts

the contamination into carbon dioxide, water, and hydrochloric acid that is combined to make salt water. This technology has a very high rate of destruction efficiency and has resulted in savings of 20% over catalytic oxidation.

New Technology

McClellan is looking for technology that will effectively clean up contamination more quickly and at a lower cost. Dual phase extraction is another demonstration technology that McClellan is seeing implemented at IC 29. Dual phase addresses not only the groundwater contamination but also the soil gas contamination.

Future efforts will focus on in-situ technologies especially in groundwater. Another area where there may be a cost saving is the Monitoring and Sampling Program. New technology will allow McClellan to place monitoring equipment online in the system that will allow real-time data turnaround, eliminating the need for a person to pull the sample and thereby improving accuracy.

Mr. Bill Shepard asked for an example of an in-situ system. Ms. Anderson said that one example is co-metabolic treatment of groundwater. This entails putting microorganisms into the groundwater that would actually degrade (or "eat") the contamination. This may also be possible for soil. Another example is a new pump and treat method where groundwater is recirculated in the well and stripped of the contaminants without pulling the water out of the ground.

In summary, the Groundwater Cleanup Program is on track. McClellan is on schedule with the goals that were set, and the phases of the IROD are being accomplished. The Soil Cleanup Program is continuing. The cleanup criteria have been set and are currently being executed, and new cleanup technologies are paying off.

Mr. Yarbrough asked where the water that is extracted from the Building 621 area goes after it has been treated. Ms. Anderson said that it goes into the sewer line.

Activities Next Quarter

Ms. Anderson briefed the RAB on the activities for the next quarter. They include:

- Remedial investigation efforts will be very active. McClellan has just completed its third quarter obligation. Over 90% of the workload has been contracted. McClellan will be working in Operable Units E – H, and will be completing the investigation efforts on the west side of the base, Operable Unit C.
- McClellan will be writing its Well Abandonment Program. This will include on- and off-base wells. The Groundwater Monitoring Program, which is a quarterly program, will continue. The groundwater and SVE operations will continue and there will be some technology testing.
- McClellan has been working on a landfill strategy. This is a concept where there are some pits on the west side of the base that have contamination and there is no

viable cleanup solution and/or technology available at this time. In support of reuse, McClellan is looking at consolidating the contamination in other parts of the base to this area, segregating it such that it can be treated in the future when there are viable treatment technologies. This idea is in the preliminary stages and is currently being discussed by McClellan and the regulators. The RAB Relative Risk group has also shown an interest in being part of this discussion.

- McClellan is coming very close to a technical agreement on how to calculate the groundwater cleanup standards. In the next year, a feasibility study for VOCs will be written. This study is the report that lays out what are the possible ways to clean this contamination in the groundwater and in the soil, and what the cost will be. This will be a decision document for making the best remedy.
- McClellan has also been developing radiological cleanup standards for soil sites and buildings.

Mr. Green asked if bioremediation was one of the in-situ technologies that Ms. Anderson was alluding to. He had heard that bioremediation projects had been dropped from the project list because of a DoD policy. After some discussion to clarify which comments Mr. Green was referring to, Ms. Anderson clarified that McClellan had removed bioventing from its DERA program, because the contamination the bioventing treats is not strictly a CERCLA issue. Rather, the bioventing program was continued as a compliance program, and has been very effective. The Base Closure Agency (BCA), which now funds McClellan's cleanup programs, will fund this type of project.

Mr. Green asked if bioremediation takes a long time to clean up contamination. Ms. Anderson said that it can and that is why McClellan is looking at ways to enhance it, such as getting oxygen down into the soil. Sometimes lack of oxygen in soil is the factor that limits organisms from growing better.

Mr. Green asked about the status of a bioremediation test project that was in place approximately a year ago. Three bioremediation projects were active during this period. Ms. Anderson said that there was one for natural attenuation in the groundwater and McClellan is proceeding with that. Mr. Healy said that about a year and a half ago there was a project involving adding phenol organic compound into the groundwater to activate bacteria. That project was canceled because of the laboratory studies. Mr. Mook said McClellan stopped work on the co-metabolic project because the cleanup media introduced into the injection well was not traveling far enough away from the well to show a cost-effective level of implementation.

Ms. Anderson said that the concept of bioremediation is still a good one, and that it is effective both cost-wise and time-wise.

McClellan does have difficulty with the Base Conversion Agency (BCA) funding innovative technology. BCA is willing to pay for innovative technology demonstrations that are not in development, but are "off the shelf" technologies that need to be proven effective at McClellan. McClellan looks for technologies with indications of a 20–30%

cost reduction. The funding source for innovative technologies and new development has to come from a different source than BCA.

In reference to the proposed landfill strategy, Mr. Shepard asked what type of materials in the landfill cannot be treated or moved. Ms. Anderson said that dioxin is one of the contaminants. McClellan does not have widespread dioxin contamination, but there are some hits on the west side of the base. Dioxin comes from burning certain chlorinated compounds. There are also some radiation issues in some of the pits.

Mr. Shepard asked how the contaminants are going to be consolidated. Ms. Anderson said that the inorganic and/or metals contamination would be consolidated into the landfill area. Dioxin contamination would be left in place and not consolidated to a different location. She emphasized that this is a concept that is still in discussion and will need to be investigated to determine if it is viable.

Mr. Dennis Green asked what actions other military facilities are taking with regards to dioxin contamination. Specifically, Mr. Green asked if they are leaving it in the ground and isolating it, or removing and incinerating it. Mr. Healy said that he doubts that they are incinerating it. He said that he was not sure what other military facilities are doing with the dioxin contamination but he would find out. Subsequent to the RAB meeting, Mr. Healy provided the following information on dioxin contamination cleanup actions at military facilities:

1. *Wright Patterson AFB 1993 ROD: capped soil (maximum dioxin concentration = 0.054 ppb)*
2. *Ogden Defense Depot 1992 ROD: off-site landfill (maximum concentration = 0.067 ppb)*
3. *Whidbey Is. Naval Air Sta. 1994 ROD: off-site disposal (maximum concentration = 0.134 ppb)*
4. *McClellan AFB 1993 Interim ROD: capped soil on site (maximum concentration = 20.9 ppb)*
5. *Fort Ord has capped landfills, further tests of other areas in progress*
6. *Mather AFB 199? ROD: excavate and dispose (on site? or off site?)*
7. *El Toro is too early in the process*
8. *Castle AFB concentrations too low to be significant*
9. *Treasure Island Naval Base concentrations too low to be significant*
10. *Yuma Naval Station concentrations too low to be significant*

Mr. Healy noted there are unconfirmed reports that offsite incineration will no longer be available after this September. Mr. Healy also noted that not all burn pits found at military bases involved solvents or other chlorinated compounds that produce dioxins when burned.

REVIEW OF PREVIOUS ACTION ITEMS

Ms. Anderson reviewed the action items from the last RAB. She did not go over the closed items but focused on the open items.

Ms. Anderson and Mr. Yarbrough discussed the pros and cons of televising the RAB meetings. Ms. Anderson said Mr. Yarbrough has also had discussions with the Sacramento Cable Commission. Ms. Anderson said that she has concerns about how well the RAB meetings and the information presented will come across on television, and is not in favor of televising the meeting as currently conducted. Mr. Rich Esposto of the Cable Commission gave Ms. Anderson and Mr. Yarbrough ideas of other ways that cable television might offer promotional assistance and provide information to the public on the RAB meetings. Ms. Anderson said that she was very much in favor of pursuing these alternative ideas. Mr. Yarbrough suggested that Mr. Esposto come out and talk to the RAB members during the Executive Session.

Ms. Anderson did not have an update on the outcome of the discussion of the Groundwater Monitoring Plan.

COMMITTEE REPORTS:

Relative Risk Ranking Committee

Mr. Green said that the committee met in June and will meet every other month at Building 269D. At the last meeting, McClellan's Environmental Management (EM) supplied the committee with information about the Relative Risk Ranking of the Site Status Report. Mr. Green said that it is somewhat difficult to get a handle on how progress is made on the cleanup and remediation of the base. There has really been no definitive answer to say where McClellan is and how far it has to go. One of the ways that this committee attempts to get a handle on this is by tracking the dates of the documents that are required in the CERCLA process and the agreements that McClellan has with the regulatory agencies. The other way is to look at the Relative Risk Ranking.

Mr. Green gave an overview on Relative Risk Ranking. Relative Risk Ranking is a tool used by the Department of Defense to assess cleanup progress among the various bases. It is not an exact science. It is not a risk assessment. It is a number or factor that has several components: contamination — how much, whether it is moving, being transported, or affecting other sites; and who, if anyone, is exposed — whether it is ecological systems or people. Taking all of these factors into account and looking at each medium separately, a value of High, Medium, or Low priority, or Finished is assigned to a site.

These rankings are changed if the contaminants are removed; if contamination is no longer moving or is being pulled back (e.g., not migrating off base); or if some kind of action is performed so that either people or ecological systems are not further exposed to contamination.

- Any site tied to groundwater contamination is rated High. Groundwater is the most dominant media for risk ranking at McClellan.
- The McClellan Relative Risk Ranking Committee has added these additional guidelines: sites lacking RI data are ranked High, sites requiring remedial actions are ranked High until proven otherwise, and sites affecting groundwater are considered High.

There has not been much change in the number of Finished sites. The largest change is the number of sites that have been moved from High to Medium ranking. McClellan now has 55 High sites versus 95 last fall. This is mostly based on the fact that conditional remedial investigation has been completed.

Ms. Anderson commented that the groundwater and SVE systems have been completed in the Phase I efforts of the Groundwater IROD.

Mr. Green said that progress is being made. This information was provided to the RAB members at a previous training session.

The next Relative Risk Ranking Committee meeting will be held on the first Thursday in August.

The Relative Risk Ranking Committee has four open action items. There is an ongoing action item that EM is to notify committee members if there is a change in the budget strategy for the upcoming fiscal year. Another ongoing action item is the issue concerning the fire rescue training facility. Mr. Green is to provide the committee with a copy of the programming documents and cover letter that summarizes strategies, assumptions, and overall budget percentages. He received that information tonight and will be making it available to the committee members at the next meeting.

Community Relations Committee

Mr. Del Callaway said he would represent Ms. Sheila Guerra in making the report for the Community Relations Committee.

RAB members should have received draft minutes for the 18 June Meeting 1997. Comments are due 16 July 1997. The next meeting will be on 17 September 1997.

The January and March meeting minutes were approved at the June meeting. The Administrative Record (AR) and Information Repository (IR) were briefed by Kevin Wong at the last meeting. This briefing will continue at the September meeting with a discussion on the cost of maintaining the AR and IR. All those interested in this matter should attend.

Mr. Danny Durkee is now making weekly visits to the IR sites. He is checking on the documentation and microfilm. There will also be a computer demonstration at the September meeting for the IR that is going on an Internet site.

Ms. Guerra received a listing of residents at two zip codes on the north end. Mr. Callaway received a 128-page book of the mailing list. He has been successful in contacting ten people out of the 34 he attempted to contact and found that all 10 did receive mailings from the base.

Base Reuse Committee

Mr. Callaway contacted Mr. Jay Wells who submitted an application to become a member of the RAB.

The Planning Team and the Action Team have suspended their meeting until further notification. Mr. Callaway said that the committees are concerned about who will and will not get the contracts.

The Grant Union High School District has requested to use Building 628 for a high school automotive shop. This building had problems in the past with radiation and a soil gas plume is currently located beneath the building. It is the Base Reuse Committee's understanding that the buildings on the base would be for "like use" for new tenants, and the committee does not think this use for Building 628 meets the definition of "like use."

Mr. Callaway said that the City Police and County Sheriff desire to put in a speed track training facility in the undeveloped areas around Beaver Pond. Mr. Callaway said that he and Mr. Yarbrough do not want a racetrack in this area because of the Beaver Pond and its pools. It would be adding more pollution to this area.

Mr. Yarbrough said that he spoke with a community member who approached him concerning this idea. This person felt, and Mr. Yarbrough agreed, that this would be a perfect place for a recreational area.

Mr. Callaway said that at the last Reuse Committee meeting a mission statement was developed for the committee (see attached). The committee approved it and he asked that the RAB review and submit comments to him. He also said that Statement E.3.b in the Reuse Committee Mission Statement did not belong there but was intended for the RAB worksheet; the Reuse Committee will need to vote on such a change.

Technical Report Review Committee

No report was provided. Ms. Anderson encouraged the Technical Report Review Committee to attend the next committee meeting in order to develop a mission statement.

Chairperson's Committee

Mr. Yarbrough explained that the Chairperson's Committee is made up of the community co-chair and various chairs of the RAB subcommittees along with EM and a representative from the regulatory agencies. The main reason for this meeting is to develop agendas for the public and the executive sessions of the RAB.

Mr. Yarbrough introduced Mr. Berry Bertrand who is a member of NARFE (National Association of Retired Federal Employees). Mr. Bertrand had submitted an application to become a RAB member. At the next Executive Session of the RAB, Mr. Bertrand will introduce himself to the RAB and a nomination will be held to determine if he will become a member of the RAB.

Mr. Yarbrough reiterated that there will be a tour of McClellan Air Force Base in September.

Ms. Anderson said that a questionnaire was mailed to RAB members. She received about half of the questionnaires back and she requested that those who did not complete this form please do so, and return it to her.

Mr. Yarbrough said that Mr. Healy requested that the RAB hold their Executive Session on the third Wednesday of the month. Mr. Healy is already on base that day attending other meetings, and switching the date would allow him to attend the Executive Session without making another trip from San Francisco. The RAB unanimously approved this change.

Mr. Yarbrough explained that the RAB had a series of training sessions for the members. He announced that the training for August was canceled. Mr. Yarbrough suggested that the tour take place on the day that the training for September would normally be held, and the following day would be the Executive Session. This was unanimously agreed upon.

Community Bulletin Board

Ms. Gidding announced that there is an ongoing public comment period for Soil Vapor Extraction and Engineering Evaluation/Cost Analysis Programs for IC 29. This period runs from 3 July 1997 through 2 August 1997.

The Community Relations Committee discussed what can be done to make the information repository more user-friendly and how to make a smooth transition to CD-ROMs.

The Environmental Action Update newsletter did go out and extra copies were available at the Community Relations table. A coupon was placed in the newsletter to help update the mailing database on names and addresses.

A final copy of the Procedure for Review and Comment on Meeting Minutes Advisory Worksheet was included in tonight's handout. This procedure was approved at the Technical Report Review Committee meeting.

AGENDA DEVELOPMENT

Mr. Green requested that Mr. Healy to go over the U.S. EPA Quality Assurance Program. He is interested in the data collection, data quality assurance, and what safe guards the agencies have to assure the quality of the data collected.

Mr. Healy said that he would request the Quality Assurance Specialist to come and brief the RAB at the next public RAB meeting.

Mr. Yarbrough said that Mr. Esposito of the Sacramento Cable Commission will speak at the Executive RAB. Also the RAB rules of order, charter, and bylaws will be reviewed.

RECAP OF CURRENT ACTION ITEMS

Mr. Healy is to supply information to the RAB on what other military facilities are doing about dioxin contamination.

Members of the Technical Report Review Committee are to contact John Leuthe about creating the committee mission statement.

The Technical Report Review and Base Reuse Committees are to have a schedule for future meetings at the chair luncheon.

Ms. Yarbrough is to invite Mr. Esposito of the Sacramento Cable Commission to the next Executive Session.

Ms. Cameron-Harley is to send an official invitation to the Executive Session to Mr. Bertrand.

Ms. Cameron-Harley is to provide the slides that Mr. Green reviewed to anyone who requests them.

Mr. Healy is to have a quality assurance person from U.S. EPA brief the public RAB.

PUBLIC COMMENTS

Mr. Callaway said that he had requested from Ms. Gidding a listing of the mail-out and she responded quickly. Mr. Callaway also requested information about a project and she and Mr. Vincent promptly contacted him. He gave her accolades for their speedy response.

Mr. Frank Miller asked if the ride share program is slated for termination.

Ms. Gidding said that the minutes from the Environmental Compliance Forum, which will be out next week, extensively address this issue. Ms. Gidding also invited anyone who would be interested in the Environmental Compliance Forum meeting minutes to let her know and she would get a copy to them.

Various members of the RAB expressed to Mr. Miller that the RAB was not the proper forum to ask questions concerning compliance issues.

Mr. Miller brought up an issue he said he had discussed with Mr. Yarbrough. He asked Ms. Anderson why she allowed a former Air Force employee to "hustle" her for contracts on behalf of a contractor. He said that this at least has the appearance of corruption and it is very unfair to other contractors.

Ms. Anderson said that, to her knowledge, she was not meeting with any former Air Force employees. She also said she has nothing to do with contracting actions. Contracting actions are handled by the procurement department and acquisition group at EM whenever contracts are put online. It would do no good to talk to her if someone were trying to get work. She said she has had contractors come and talk to her about the skills that they have, although she did not know that any of them who had recently talked to her were former Air Force employees. She said that she tells them she will give them some of her time to invest in letting them understand what McClellan's program is about so that they can better do their job. But she has nothing to do with contracting process and talking to her is going to do absolutely nothing for them in terms of getting any work. She asked if Mr. Miller had the name of someone.

Mr. Miller said he did, and that Mr. Yarbrough knows the name.

Mr. Yarbrough said he believed Mr. Miller was talking about Lee Lewis.

Ms. Anderson said she has no interaction with Mr. Lewis. Mr. Lewis does not participate in any of the IRP meetings that she knows of. She also pointed out that there is a restriction on anyone leaving government service and going to work for a contractor concerning with how long they have to be away from government service before they can work on government contracts or contracts related to the base. Once someone meets that requirement, they've done what they need to and they are as free as anyone else to come and talk with people.

The following other questions and comments were discussed during the meeting.

Mr. Miller asked about the situation that lead to a U. S. EPA notice that McClellan had failed wastewater standards. He asked how many years had this failure been occurring, and why the treatment plan failed inspection.

Ms. Anderson said that McClellan AFB did receive a Notice of Violation for operations on its industrial waste line from the U.S. EPA. The violation was also sent to the County at that time. She said that McClellan AFB is in compliance with the permit it currently has and has been in compliance with that permit issued by the County. McClellan AFB is now in the process of having a new permit issued, which takes into consideration EPA's interpretation of the regulations. This interpretation is different from the County's interpretation. McClellan AFB is currently in compliance with the new proposed permit

on the discharge from Industrial Waste Treatment Plant 1, which is the last outfall from the base that goes into the County sewer system.

Ms. Anderson explained that the wastewater treatment plant did not fail inspection. As she understood it, the permit conditions were not set up the way EPA interprets the regulation. It has to do with the treatment or the concentrations that are coming out of the individual sources on the base. Those are then all fed into the Industrial Wastewater Treatment Plant on the west side of the base. All of the industrial waste lines do finally converge at this one plant, which then treats the water and releases it into the sewer system. Because of the reuse efforts, the treatment is being pushed back to those source areas in the buildings that discharge to the Industrial Wastewater Line (IWL). As the private companies come, if they should win that competition, each company will need to be responsible for its own permits at its own source areas. By adding the pre-treatment at the sources, McClellan AFB will comply with EPA's interpretation of the regulation.

Mr. Miller asked Mr. Healy to explain what the Notice of Violation said.

Mr. Healy said that, as he understood it, when there are heavier flows of water, the water diluted the concentrations of metals and other industrial contaminants to the point that, when they reached the treatment plant, there didn't need to be much treatment because the treatment plant was only required to reduce the concentration to an acceptable level. But in many cases during the year, apparently the wastewater flowing through was already very close to those concentrations. It was legally able to be discharged, according to the permit. But what the person in the U.S. EPA Water Division explained to Mr. Healy, was that he felt that McClellan should have known or thought about this issue beforehand. The County should also have thought about that. Instead, it appeared that when the permit was written, no one considered this problem which occurs when there are heavy water flows. The solution is to have enough treatment to preclude putting out a certain mass or weight of contaminants per year.

Ms. Anderson explained that the permit said McClellan AFB needed to meet certain discharge requirements. The concentrations of contaminants leaving the base needed to be at or below a certain level. McClellan AFB has met those requirements, and is committed to continue to meet those requirements. If those levels change, McClellan AFB will adjust its program, which is what it is doing right now. Ms. Anderson also introduced a representative from the Regional County Sanitation District, Mr. Glen Del Sarto.

Mr. Del Sarto said he is the Industrial Wastewater Program Manager, and that it is his responsibility to regulate what is discharged into the sewage system from McClellan. He said that the U. S. EPA based their Notice of Violation on the fact that there was rainwater intrusion into the system. He said that 90% of the year those discharge limits were perfectly fine; however, when there was a heavy rainstorm, on some areas on the base there was water flowing into the sewer system, thereby diluting the wastewater in the system. At this point the concentration limits became defective. A revised permit was

just recently sent to EPA. Mr. Del Sarto said that EPA had approved the new permit the day before the meeting.

Mr. Miller asked if that intrusion was an unlawful deviation from the permit, and if McClellan AFB should have known about it.

Mr. Del Sarto said there was no blame to be placed. The same individual who performed the inspection also performed the inspection five years ago. The same permit was in place, the same information was available, and the same calculations were provided by the County and by McClellan AFB for both inspections. There just happened to be worse storms this year, so EPA issued a Notice of Violation. He said that a Notice of Violation is like a ticket saying that you've done something wrong. The notice had not been issued five years ago because no one involved had taken into account the rainfall that happens at the worst time of year. That has been rectified.

Mr. Del Sarto also said that the difference between the agencies was basically a technicality, a different way of interpreting the regulation, and that EPA would admit that as well.

Mr. MacDonald explained that the water intrusion was actually designed to work that way. At the Mat K area, which is a refueling area, if there was a spill, the water used to clean up the spill had to be contained. The water then flows into the IWL. In case of a spill, that intrusion is actually designed to occur, but all that inflow from rainstorms was not taken into account when that permit was developed. It's not like it was bad practice, or that McClellan tried to maximize or minimize something. They were actually doing a better environmental job by containing that water that was falling on the containment area.

Mr. Yarbrough asked if all this water from Mat K, where hazardous wastes are being stored, was from other areas. He wanted to make sure it was not from a broken pipe or similar discharge.

Mr. MacDonald said that any industrial waste line or sanitary waste line will have leakage into the system from storm water. For example, there are manholes that leak into the system. This extra water is not wastewater; it's storm water. As for broken pipes, Mr. MacDonald said that McClellan AFB did a survey, and closed any cross connections between the storm water and industrial waste lines. The storm water is separated as much as possible from the industrial wastewater.

Mr. Miller said he had noticed that the amount of pounds removed printed in the Environmental Action Update has significantly slowed down. He asked if there are soil vapor extraction systems that are becoming less cost effective, and didn't some of them need to be terminated.

Ms. Anderson agreed that they have seen a quite a bit of cleanup at some of our sites. She reminded the group about how McClellan AFB has informed the RAB that as the

catalytic oxidation systems at IC 1 and IC 7 have become less cost effective; McClellan AFB has moved those treatment systems to other sites, where they are now treating higher levels of contamination. McClellan AFB has in turn put carbon treatment onto those systems now that very low masses remain. One of the next things they are going to be looking at is, at IC 1 and IC 7, they may be reaching that point where they can start talking about whether it's time to turn that soil treatment system off. The carbon treatment systems that are on right now are relatively inexpensive in terms of the payback for that cost.

Mr. Miller asked how the number of pounds removed, the 550,000 pounds, was calculated.

Ms. Anderson said it is a combination of both what comes out of the groundwater systems and soil vapor extraction systems. Those systems are monitored, the inlet and outlet concentrations, because they have to make sure that the units are working properly. That allows them to calculate how many pounds are going through that system. Those numbers are reported on a monthly basis.

Mr. Miller asked if contractors supply that number and if McClellan AFB validates that number.

Mr. Bob Shirley of EM said that EM gets monthly reports for each one of the treatment systems. They look at that number and usually round it down. The numbers are supplied by a contractor, as data provided by the laboratory and assessed for quality assurance/quality control (QA/QC).

Mr. Kevin Wong explained that when the program began, EM looked at the analytical results closely. They got a good record of what's going on, what the contractors are doing, by looking at the analytical results and seeing how they came up with mass balances from flow rate concentrations. McClellan AFB saw that the contractors were doing a good job, so EM reduced the amount of review they do. They do review the data, but not as often.

Mr. Miller asked how long it has been since they stopped reviewing the data as frequently.

Mr. MacDonald said he checked about half the data developed from labs. These are certified labs independent of that particular contractor. An EPA contractor also supplies a lot of the data. He said he has found minor errors, but reminded the audience that these numbers are not very precise. He said that the "ballpark" would probably be between 500,000 and 800,000 pounds. So 550,000 pounds is a good enough number because it is within that range.

Mr. Healy said McClellan AFB is following sampling plans and requirements that are quite strict under EPA's quality assurance program. All of the sampling done at McClellan has been reviewed by the quality assurance people at EPA. There are

performance evaluation standards, and blind samples are sent to the laboratory. There are numerous checks of the data by various people and checks of the contractors to see if they are doing this.

Mr. Miller said that at the last Environmental Compliance Forum, there had been a briefing on the rideshare program. The contract for the program is nearly \$87,000. He said he had asked for an itemized list of the major expenses for the contract. None of the pertinent information that he requested was provided at that meeting. He asked the rideshare coordinator how many rides had been hooked up in the past week, the past month, the past quarter, the past six months, the past year, and this person was totally non-responsive. The job was started in October of 1991; and taxpayer groups have looked at this item and are requesting that this contract be terminated as soon as possible.

Ms. Gidding of EM Public Affairs said she was at that same meeting, and that the minutes of that meeting would probably be out the next week. She wanted to mention that Rebecca Garrison, who heads up this program under contract to McClellan, spent considerable time answering those questions and spent time with Mr. Miller at the poster board station.

Mr. Green said that he thought the meetings were getting confused. The meeting Mr. Miller referred to was a compliance meeting. This meeting is for the Installation Restoration Program, which is a totally different situation and has nothing to do with the rideshare coordinator.

Mr. Miller asked about an item on the Administrative Record budget. He said that it had come to his attention that files of the Administrative Records are being transported from one building to another building on base. Even though the base has a motor pool with vehicles available for transportation, such as pickup trucks, Environmental Management was spending several thousands of dollars on van rentals to do this, when they have transportation equipment available.

Ms. Gidding explained that Environmental Management was planning to brief that at the last Community Relations Committee meeting on June 18th, but because only three community members were at the meeting, Sheila Guerra asked that the item be deferred until the September meeting. All of those answers will be reviewed in great detail with the Community Relations Committee. She welcomed Mr. Miller to attend that meeting.

Mr. Callaway said that the transportation Mr. Miller referred to was not on the base. That was from the base to Camp Kohler. They were transferring off base. He thought it was a time when most of the vehicles were busy. He agreed the committee had not discussed the issue because, as Ms. Gidding had said, there weren't enough people there at the meeting. It was therefore postponed until the September meeting.

Mr. Miller said that, at a prior meeting, Ms. Gidding had said that the cost for the Environmental Action Update is \$22,000 a year. He asked if that was with or without postage.

Ms. Gidding said that includes postage.

Mr. Miller asked how many are mailed out.

Ms. Gidding said the number fluctuates, but approximately 2,200 newsletters are mailed.

Mr. Miller asked if Ms. Gidding planned to run any more articles on Creek Week, which had been covered in two different issues. He said it created the appearance that McClellan was straining to put information in the newsletter.

Ms. Gidding said she had wanted to thank the people in the community who volunteered their time. In the April edition, McClellan AFB was getting ready to do Creek Week, so the article was a notice to everyone of where the activities were, and how they could they be involved. The photo in the most recent newsletter was a little follow-up with just a picture, a caption, and a thank you. There were quite a number of events going for that, and Ms. Gidding said she wanted to cover that with the community members, to let them know that McClellan AFB is just as concerned as they are with these cleanups. McClellan AFB appreciates that they come out to the base and help cleanup areas out here.

Mr. Yarbrough moved to adjourn the meeting. Mr. Callaway seconded it.