

**SPILLS AND IMMEDIATE RESPONSE (SIR) INITIATIVES
PENNSYLVANIA AIR NATIONAL GUARD (PaANG)
WILLOW GROVE AIR RESERVE FACILITY
WILLOW GROVE NAVAL AIR STATION
WILLOW GROVE, PENNSYLVANIA**

**PADER KICK-OFF MEETING MINUTES
MAY 9, 1991**

DCN: Willow Grove 2 37101
Title: Meeting Minutes for 8-9 May
1991
ARF
09 May 1991

A kick-off meeting was held between the Base, National Guard Bureau (NGB), Hazardous Waste Remedial Actions Program (HAZWRAP), PEER Consultants, P.C. (PEER), and the Pennsylvania Department of Environmental Resources (PADER) at Willow Grove Air Reserve Facility on May 8-9, 1991 to discuss investigations and actions for the potential release of diesel at the Fuel Station Facility (Facility No. 352) which includes two 6,000-gallon tanks and a refueling island. The list of attendees is provided in Attachment 1.

Louis Lantner of the NGB described the current situation. A 6000 gal. fiberglass tank used for diesel fuel leaked approximately 1000 gal. after it was filled in preparation for leak testing. The leak was reported to the state on May 16, 1990. The tank was emptied and taken from service, but remains at the site.

Marcella Stoltz, PADER/Bureau of Water Quality/Southeast Region, supplied a guidance document (Attachment 2; Reference #1) and presented a summary of the pertinent regulations and state guidance. In general, the state recommends a tank removal/site assessment approach. Petroleum contaminated soil is classified as a residual waste if petroleum content is less than 1%. Marcella Stoltz also indicated that two landfills within the area accept residual waste (Crows Landfill, Falls Township, Bucks County, and Pottstown Landfill, Pottstown, Montgomery County). Mike Minor, of the NGB, raised the issue of residual liability from landfilling. Marcella Stoltz indicated that even though petroleum contaminated soil (less than 1%) is considered a residual waste, the NGB could still be considered a PRP if the landfills were listed on the NPL. Landfarming is strictly controlled and allowed by exception in Pennsylvania. Petroleum contaminated soils may also be incorporated as feed material at two asphalt batch plants (Soil Safe, Baltimore, MD, and Keystone Lock, Bucks Co., PA).

Action limits for soil are determined case-by-case based on background levels. Action limits for groundwater are based on Drinking Water Regulations or background, but are subject to case-by-case analysis. Background levels at the site will most likely be nondetect. Currently, PADER has not set a timetable for required actions, but if no progress is made, a Notice of Violation (NOV) may be issued.

With respect to a Site Assessment, Marcella Stoltz indicated that PADER review of the Work Plan is not required. In addition, permits are not required by the Bureau of Water Quality for the installation of monitoring wells, but may be required by other PADER Divisions. Marcella Stoltz also noted that Pennsylvania does not have an analytical laboratory certification program, but USEPA methods must be followed.

ATTACHMENT 1

MEETING ATTENDEES

| <u>Name</u> | <u>Organization</u> | <u>Phone</u> |
|--------------------|------------------------------------|---|
| Louis Lantner | NGB/DEVR | (301) 981-8844 |
| Michael Minior | NGB/DEVR | (301) 981-8155 |
| Lori Melroy | PEER | (615) 483-3191 |
| Patrick Mulligan | PEER | (615) 483-3191 |
| Hal Dusen | 913 TAG/DEEV | (215) 443-1107 |
| Pat Liebman | 913 TAG/PA | (215) 443-1062 |
| David W. Bunn | HAZWRAP | (615) 435-3318 |
| William F. Rothert | 111 TASG/DE PaANG | AV 991-1348 (215) 443-1348 (215) 443-1871 (FAX) |
| Bill Johnston | HAZWRAP | (615) 435-3174 |
| Marcella Stoltz | PADER (Bureau of Water Quality) | (215) 832-6130 |

**SPILLS AND IMMEDIATE RESPONSE (SIR) INITIATIVES
PENNSYLVANIA AIR NATIONAL GUARD (PaANG)
WILLOW GROVE AIR RESERVE FACILITY
WILLOW GROVE NAVAL AIR STATION
WILLOW GROVE, PENNSYLVANIA**

**SCOPING/BRIEFING MEETING MINUTES
MAY 8-9, 1991**

A scoping/briefing meeting was held at Willow Grove Air Reserve Facility on May 8-9, 1991 to discuss investigations and actions for the potential release of diesel and/or MOGAS at the Fuel Station Facility (Facility No. 352) which includes two 6,000-gallon tanks and a refueling island.

The scoping/briefing meeting consisted of:

- o An initial briefing for Base, National Guard Bureau (NGB), and Hazardous Waste Remedial Actions Program (HAZWRAP) personnel (May 8, 1991);
- o A coordination meeting, site visit, and data collection period for the NGB, PaANG, HAZWRAP, and PEER Consultants, P.C. (PEER) (May 9, 1991);
- o A kick-off meeting between the Pennsylvania Department of Environmental Resources (PADER), and the NGB, PaANG, HAZWRAP, and PEER (May 9, 1991); and
- o A close-out meeting between the NGB, PaANG, HAZWRAP, and PEER (May 9, 1991).

Initial Briefing. The list of attendees is provided in Attachment 1. Louis Lantner of the NGB presented an overview of the Installation Restoration Program and the Spills and Immediate Response (SIR) Initiatives. The NGB/DEV, with HAZWRAP, has developed the SIR Initiatives to provide immediate response to the Air National Guard (ANG) to conduct site assessments, corrective designs, and corrective actions.

Lt. Col. Rothert described the current situation. A 6000-gal. fiberglass tank used for diesel fuel leaked approximately 1000 gal. after it was filled in preparation for leak testing. The leak was reported to the state on May 16, 1990. The tank was emptied and taken from service, but remains at the site. It had been standard procedure prior to filling for the leak testing to fill the tank to a maximum of 80% full. It was generally agreed that this indicated that the tank may have an undocumented prior history of leaking that predates the event that was reported to the state.

Following Lt. Col. Rothert's overview, the following items were discussed:

- o IRP investigations have been conducted at the Navy and Air Force Reserve facilities at the Naval Air Station. Documents are available detailing those investigations.
- o The need for public participation in the project was discussed. Mike Minior pointed out that NGB policies for public involvement would be followed unless Pennsylvania requirements take precedence.
- o In discussions concerning procurement activities for the tank removal contract, Richard Boger pointed out that contracting up to \$100,000 would be handled at Willow Grove. Any contracting above that amount would require the participation of the State office.

During the remainder of the afternoon, NGB and HAZWRAP team members inspected the site and discussed prior use of the tank with PaANG personnel.

Coordination Meeting. The SIR Team (NGB, HAZWRAP, & PEER) conducted a walkover of the Fuel Station Facility and adjacent areas, and reviewed pertinent reports and engineering drawings. A list of documents and drawings obtained is provided in Attachment 2.

PADER Meeting. The list of attendees is provided in Attachment 3. Marcella Stoltz, PADER/Bureau of Water Quality/Southeast Region, supplied a guidance document (Attachment 2; Reference 1) and presented a summary of the pertinent regulations and state guidance. In general, the state recommends a tank removal/site assessment approach. Petroleum contaminated soil is classified as a residual waste if petroleum content is less than 1%. Marcella Stoltz also indicated that two landfills within the area accept residual waste (Crows Landfill, Falls Township, Bucks County, and Pottstown Landfill, Pottstown, Montgomery County). Mike Minior, of the NGB, raised the issue of residual liability from landfilling. Marcella Stoltz indicated that even though petroleum contaminated soil (less than 1%) is considered a residual waste, the NGB could still be considered a PRP if the landfills were listed on the NPL. Landfarming is strictly controlled and allowed by exception in Pennsylvania. Petroleum contaminated soils may also be incorporated as feed material at two asphalt batch plants (Soil Safe, Baltimore, MD, and Keystone Lock, Bucks Co., PA).

Action limits for soil are determined case-by-case based on background levels. Background levels at the site will most likely be nondetect. Action limits for groundwater are based on Drinking Water Regulations or background, but are subject to case-by-case analysis. Currently, PADER has not set a timetable for required actions, but if no progress is made, a Notice of Violation (NOV) may be issued.

With respect to a Site Assessment, Marcella Stoltz indicated that PADER review of the Work Plan is not required. In addition, permits are not required by the Bureau of Water Quality for the installation of monitoring wells, but may be required by other PADER Divisions. Marcella Stoltz also noted that Pennsylvania does not have an analytical laboratory certification program, but USEPA methods must be followed.

Close Out Meeting. Col. Rothert also indicated that the site has a history of MOGAS leaks, including a 2,000 gal leak occurring in the mid-70s and problems with movement and leakage of the fill pipe.

The SIR Team reviewed the findings from the PADER meeting and site inspections and developed a plan of action and schedule for the site:

- o Plans and Specifications for removal of two tanks are to be prepared using a 3-ft over-excavation as the biddable quantity and assuming disposal at the nearby batch plant.
- o A "contingency" Site Assessment Work Plan is to be prepared should additional investigative work be required.
- o If groundwater contamination has occurred from reported historical releases rather than the 1990 leak, responsibility for action may be shifted.
- o The following schedule for deliverables was agreed upon:
 - Draft UST Removal Plans and Specifications May 24, 1991
 - HAZWRAP and NGB Comments May 30, 1991
 - Draft Cost Estimate May 30, 1991
 - Preliminary Final UST Removal Plans and Specifications June 6, 1991
 - NGB Approval June 7, 1991

- Final UST Removal Plans and Specifications (with final Cost Estimate) June 11, 1991 (shipping date)
- Draft Site Assessment Work Plan July 1, 1991
- HAZWRAP and NGB Comments July 8, 1991
- Final Site Assessment Work Plan July 15, 1991

ATTACHMENT 1

MEETING ATTENDEES

| <u>Name</u> | <u>Organization</u> | <u>Phone</u> |
|--------------------|---------------------|-------------------------------|
| Louis Lantner | NGB/DEVR | AV 858-8844 (301) 981-8844 |
| Michael Minior | NGB/DEVR | AV 858-8155 (301) 981-8155 |
| Bill Johnston | HAZWRAP | (615) 435-3174 |
| Alex Luyando | 111 TASG/DE | (215) 443-1347 |
| Bill Rothert | 111 TASG/DE | AV 991-1348 (215) 443-1348 |
| Pat Liebman | 913 TAG/PA | (215) 443-1062 |
| Linda Platt | 913 TAG/PA | (215) 443-1062 |
| Joseph G. McCann | 111 TASGp/LGTM | (215) 443-1369 |
| Fravais Mezzatesta | 111 TASGp/DCR | (215) 443-1341 |
| Haz Dusen | 913 TAG/DEEV | AV 991-1107 (215) 443-1107 |
| Richard W. Boger | USPFO PA | AV 238-8687 (717) 865-8687 |
| David W. Bunn | HAZWRAP | (615) 435-3318 |

ATTACHMENT 2

INVENTORY OF DOCUMENTS AND DRAWINGS

- 1) Bureau of WQ Management - Staff Guidance for Underground Storage Systems in PA - Closure/Charge-In-Service Site Assessment/Remediation. Division of Permits and Compliance. Bureau of WQ Management. Department of National Resources. April 1990.
- 2) Site Inspection Studies of NAS Willow Grove, Horsham Township, PA (Vols. I & II). EA Engineering, Science, & Technology, Inc. May 1990.
- 3) Feasibility Study Report for Willow Grove Air Resource Facility, PA. Dames & Moore. March 17, 1989.
- 4) Engineered Constr. Performance Specifications - Closure/Removal of Two (2) 6,000 Gallon Underground Single Wall Fiberglass Petroleum Storage Tanks. Storb Env. Inc. August 14, 1990.
- 5) Drawings

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop
HV and Plumbing Floor Plans
NAVFAC Drawing #2009874
M-2, 1/15/74, Revised 7/14/75
Sheet 8 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop
Site Plan
NAVFAC Drawing #2009867
AME-1, 1/15/74, Revised 7/14/75
Sheet 1 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop and Auto Shop and Auto Storage
Foundation Plans and Details
NAVFAC Drawing #2009873
S-1, 1/15/74, Revised 7/14/75
Sheet 7 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop
Fuel Pump Island, Toilet and Miscellaneous Details
NAVFAC Drawing #2009872
A-6, 1/15/74, Revised 7/14/75
Sheet 6 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop
Details
NAVFAC Drawing #2009876
M-4, 1/15/74, Revised 7/14/75
Sheet 10 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop and Auto Shop and Auto Storage
Wall Sections
NAVFAC Drawing #2009871
A-5, 1/15/74, Revised 7/15/75
Sheet 5 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop
Automotive Shop - Plans and Schedules
NAVFAC Drawing #2009868
A-2, 1/15/74, Revised 7/15/75
Sheet 2 of 13

NAS Willow Grove, Pennsylvania
Automotive Maintenance Shop
Elevations and Sections
NAVFAC Drawing #2009869
A-3, 1/15/74, Revised 7/15/75
Sheet 3 of 13

913 Tactical Airlift Group
U.S. Air Force Reserve
Base Layout
Willow Grove Air Reserve Facility
Willow Grove, Pennsylvania
October 1990
TAB C-1B

ATTACHMENT 3

MEETING ATTENDEES

| <u>Name</u> | <u>Organization</u> | <u>Phone</u> |
|--------------------|------------------------------------|---|
| Louis Lantner | NGB/DEVR | (301) 981-8844 |
| Michael Minior | NGB/DEVR | (301) 981-8155 |
| Lori Melroy | PEER | (615) 483-3191 |
| Patrick Mulligan | PEER | (615) 483-3191 |
| Hal Dusen | 913 TAG/DEEV | (215) 443-1107 |
| Pat Liebman | 913 TAG/PA | (215) 443-1062 |
| David W. Bunn | HAZWRAP | (615) 435-3318 |
| William F. Rothert | 111 TASG/DE PaANG | AV 991-1348 (215) 443-1348 (215) 443-1871 (FAX) |
| Bill Johnston | HAZWRAP | (615) 435-3174 |
| Marcella Stoltz | PADER (Bureau of Water Quality) | (215) 832-6130 |