

FEDERAL FACILITIES FORUM TELECONFERENCE

March 11, 2004

SPRING 2004 TSP MEETING AND NARPM CONFERENCE

The Spring 2004 TSP meeting will be held in conjunction with the NARPM conference during the week of May 24 in Miami, FL. Forum members who are also NARPM members or are serving as NARPM workshop trainers may register for the conference on-line (at www.epanarpm.org) at any time. Registration for other Forum members begins after March 31, 2004. Sufficient space is anticipated to allow the Forum's participation in any of the NARPM sessions. The Forum is invited to participate in the NARPM field trip to the Everglades on Friday, May 28.

The Forum will hold a full day of business sessions on Wednesday, May 26. If needed, additional sessions will be held the following afternoon. All TSP forum co-chairs are requested to participate in NARPM activities on the evening of Sunday, May 23. TIFSD will cover Forum expenses for hotel accommodations beginning Monday, May 24, in addition to any accrued on Sunday, May 23, due to early travel of West Coast participants or to other travel requirements. TIFSD does not anticipate covering hotel expenses following the NARPM field trip on Friday. Overall contractor support for the NARPM meeting will be provided by TetraTech.

ACCEPTABLE THRESHOLDS FOR RADIOACTIVE WASTE

Glenn Kistner (Region 9) described problems regarding management of radioactive waste at McClellan Air Force Base. More than 30 onsite disposal areas exist at McClellan, many of which contain radioactive waste and may qualify as RCRA landfills. Potential waste materials include cesium, radium, and weapons-grade plutonium. Primary options for addressing the waste include presumptive remedies involving onsite consolidation and capping or removal for offsite shipping.

In developing a base-wide conceptual model for cleanup, it has become apparent that insufficient funding is available to achieve clean closure at all of the radioactive waste sites. The cost for clean closure of each site is estimated to exceed \$60 million. In light of this financial burden, Region 9 is evaluating an acceptable threshold for radioactive waste that remains onsite. Addressing the issue has involved extensive community relation efforts.

Judith McCulley (Region 8) described similar problems involving radioactive waste dumped in trenches at Lowry Air Force Base. RCRA closure of the waste areas, which has involved extensive capping, is underway in accordance with state guidelines. The Air Force plans to conduct additional sampling to determine whether radioactive waste has affected ground water.

The Forum suggested that DOE sites that have undergone privatization or other operational changes may provide additional examples of how the McClellan waste could be handled. For example, similar problems were faced at DOE's Mound facility. Site-specific risk factors, rather than radioactive waste volumes or concentrations, were used at Mound in accordance with industrial standards. It was noted that UMTRICA standards (found at 40 CFR 192) may be used to establish specific concentration thresholds.

DIOXANE TESTING

Christine Williams (Region 1) indicated that Region 1 plans to dispute the Navy headquarters' recent refusal to test for 1,4-dioxane at two facilities until state or federal standards are established. As a result, Region 1 likely will conduct the necessary testing. It was noted that the State of California's pending "emerging chemical" list and related standards are expected to include 1,4-dioxane.

OPEN MIC

Mike Overbay (Region 6) described efforts to develop a FOST for an Air Force site in Louisiana. Although the State of Louisiana does not allow deed restrictions, EPA and the Air Force have agreed to include such restrictions in the FOST in order to limit ground-water use. It is anticipated that the affected property will be conveyed to a local land use authority that would hold responsibility for the site's RCRA permit, which may include ground-water restrictions.

The Forum noted that an alternative approach may be the use of real estate interest provisions in the FOST. Though typically used by the Air Force to gain property access involving mineral rights, this mechanism may apply to restrictions regarding ground-water use. Another option may be the use of a grant of environmental restriction, which (under state legislation) allowed the State of Massachusetts and Army to retain rights regarding land use at a Region 1 facility.

Overbay also described recurring problems posed by multi-unit residential complexes adjacent to contaminated sites at military facilities. HUD regulations require that a survey of all residential units be conducted to determine the potential presence of lead-based paint or asbestos. The extent to which military facilities are conducting complete surveys is of concern to EPA. Partial surveys, such as the Air Force's recent inspection of only 14 units at a 200-unit complex, does not support Air Force claim that all remediation inspections have been completed. As a result, Region 6 has refused concurrence until surveys are completed at all 200 units.

ATTENDEES

Christine Williams, Region 1
Paul Ingrisano, Region 2
Felicia Barnett, Region 4 HSTL
Dave Seely, Region 5
Mike Overbay, Region 6
Jim Kiefer, Region 8
Judith McCulley, Region 8
Glenn Kistner, Region 9
John Quander, TIFSD
Rich Steimle, TIFSD
Tracey Seymour, FFRRO
Randall Ross, ORD/Ada
Sandra Novotny, EMS, Inc.