

March 7, 2005
Rev March 22, 2005

**HTW BCT Meeting Minutes for Operable Unit 1
Former Fort Ord, California
February 25 , 2005**

1. An HTW BCT meeting was held February 25, 2005, at the BRAC Conference Room, Former Fort Ord, California. The portion of the meeting dedicated to Operable Unit 1 (OU-1) was held from 1:00 p.m. to about 4:00 p.m. Attendees included the following representatives:

Gail Youngblood	US Army	Martin Hausladen	US EPA
Derek Lieberman	US Army	Bill Mabey	TechLaw
David Eisen	US Army	Grant Himebaugh	CA RWQCB
Stewart Black	CA DTSC		

HGL: Don Jones; Bob Parkins; Dennis McCrumb; Roy Evans
2. A meeting agenda was distributed. A summary of key issues and decisions/actions are described in the following paragraphs.
3. Army/Agency Review of HGL's Delivery Document Matrix: The agencies have not reviewed the matrix. Mr. Jones explained that formal acceptance by the Army and Agencies of every submittal is a contract requirement for invoices to be approved. Mr. Himebaugh stated that historically no Regulator response implies acceptance and that formal letters of acceptance for every document are not generally generated. After discussion it was suggested that:
 - a. All HGL cover letters should state the review periods in the text to aid the reviewers in determining priorities.
 - b. In the absence of a formal document approval, HGL will bring a letter/memo to the BCT meetings for signature by the meeting participants that documents are approved. This will provide the official nod to proceed with the next document or action and help satisfy HGL's contract requirements.
4. Phase 3 Field Activity Work Plan: There was a lengthy discussion of the Phase 3 Work Plan, which encompasses doing a pump test along the northern boundary road. It was clarified that HGL proposes to treat the pumped groundwater with a GAC unit and then discharge the effluent (about 3 gpm) on the surface within the footprint of the plume in the FONR. The Regulators verbally approved the plan.
5. Submittal of Explanation of Significant Difference (ESD): There was also a lengthy discussion on the impact of an Interim ROD vs. an ESD and the need for fact sheets and a public meeting to inform the public that the TCE plume has migrated off the OU-1 property. After conferring with EPA management, Mr. Hausladen said the EPA will not require an interim ROD but will allow an ESD

provided a public meeting is held very soon. HGL will be allowed to continue work concurrently with the ESD process. Mr. Lieberman and Mr. Parkins broke off from the meeting to write a fact sheet for use at the next day's public work shop/open house. This event will serve to inform the public that the plume is off site. HGL will also expedite a public meeting, preferably in March. Mr. Black stated DTSC will send a letter "to do something beyond the road", i.e. the road that marks the northwest boundary of the OU-1 and the FONR.

Note 1: Mr. Black later emphasized that DTSC is concerned about the potential impact of migration of the OU-1 groundwater plume to the north and northwest. DTSC's position is that the plume must be fully characterized as soon as possible.

Note 2: HGL's February submission of the Draft 60% Engineering Design Report, Volume 1, which is part of the public record, also provides data on TCE readings at the OU-1 boundary, indicating probable plume migration.

6. Discharge Parameters for Treated Water: Discussion continued, as in the past, on whether the Regulators would approve injecting treated water into the plume, which is a key component of HGL's planned remediation strategy. Mr. Hausladen reported that EPA management is willing to allow injection of treated water outside of the 5 parts per billion (ppb) contours and into the sides of the plume, like "squeezing a toothpaste tube". This allowance would permit injection within the 1 ppb contour boundary. HGL will need to demonstrate that injection does not result in spreading the plume. Such a demonstration will require presentation of modeling results to show both particle tracking from proposed injection well points and mass transport calculations of plume boundaries and concentrations.
7. Restart of EW 18: HGL explained the reasons for restarting extraction well EW 18, which was turned off about two years ago. Mr. Himebaugh expressed appreciation for HGL's initiative to take action without being told. Mr. Black indicated he would, if necessary, discuss the details further with Mr. Evans.
8. Mr. Black had to depart. Mr. Himebaugh, Mr. Hausladen, and Mr. Mabey discussed with HGL the conceptual outline of the offsite plume investigation. HGL described the plan they had discussed earlier with Mr. Black and Mr. Racca. That plan proposed an initial effort of 5 soil borings along the northern boundary road and in the adjacent off-site property owned by Mr. Armstrong. These borings would identify the top elevation of the SVA and also be used to collect a groundwater sample. A set of 5 resistivity surveys would then be conducted that included the soil boring locations to provide "ground truth" for interpretation of results. After review of the groundwater quality and interpretation of the SVA surface elevation contours, well locations would be selected, as appropriate. Approximately 3 to 8 monitoring wells would be installed to define the offsite plume boundary. The EPA and RWQCB approved this approach. HGL will

submit a work plan detailing this effort by 24 March 2005. EPA indicated they would provide an “on-board” review to expedite the start of field activity.

9. HGL indicated they have already initiated discussion with the landowner north of OU-1 to gain access to conduct field work.

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