

CHEVRON MEETING WITH NPS
FEBRUARY 17, 1994

Representatives: Chevron - Eric Dady and Robin Smith; Texas Railroad Commission - Charlie Ross and John Tintera; National Park Service - Dan Hanson and Ernie Rolston (Washington Office), Gary Rosenlieb (Colorado Office), Linda Dansby (Southwest Regional Office in Santa Fe), and Charles Farabee (Butch) and Paul Eubank (Padre Island National Seashore)

Charles Farabee, Superintendent of Padre Island National (PAIS) Seashore, said that this meeting is to focus on PAIS and the National Park Service concerns that may be facing us at the park. We think we have an assemblage of tremendously impressive people and are pleased with the cooperation and credentials that we have here. As the manager for PAIS, it's been a comfort for me to understand that I have these people as consultants and will help us try to take care of some things we need to take care of. The Park Service (NPS) has never really had an assemblage of this mix to address this type problem, that not only faces us here at PAIS but throughout the system.

We don't see this as an adversarial relationship. We are eager to have this as an "us/us" relationship, instead of an "us/they" relationship. We hope we can work together, and so far it has been a pleasant and interesting dialogue.

I have asked them to be as timely as possible. We would like to share roles, responsibilities, and understand who does what, and the chains of communication. We do have concerns and we will not come "eye to eye" on everything; there will be dialogue and discussion. We are looking to you, as well as internally, for some answers.

Ernie - We are looking forward to establish a team. Linda will be the project coordinator and will be the central point of contact.

John - My agency (Railroad Commission) regulates oil & gas and is the lead state agency associated with this site. I want to thank Chevron for coming to the meeting and appreciated. I realize this is a voluntary effort on Chevron's part. It was stated that there are NO violations or complaints. I will relay any pertinent information to (Heidi's office) the other state agency (which was not represented at this meeting). John should be the point of contact with the Railroad Commission.

Robin - I appreciate the opportunity to be at the meeting and it's good to be a part of this process.

Paul Eubank will be the main point of contact at the park.

John - There are several things we can mention and discuss that you can take with you as working topics. The first one is to bring communication and organization to this project. We need to know the people involved and the roles they are playing. The second is data submission - to make sure that everyone involved in this project are all at the same starting point. The final one is more technical - the delineation aspect of the site. Those are the three things we would like to approach today. Robin agreed those were important topics for Chevron, also.

The federal, state, and Chevron's interests are all involved with this site. Efforts should be coordinated in the same time frames. This is not an emergency situation, but there is probably some urgency.

Data submission - There has been a K.W. Brown report and the Railroad Commission would like to get a copy of it with a brief cover letter. I realize that the site has been closed and files may be difficult to get. If the files are available it will help with delineation problems.

Linda - The NPS provided copies of information to Chevron. Robin was not aware of this and asked Linda to find out who it was sent to.

Robin is the main contact for Chevron.

John - As far as the informal agreement, we just want to make sure the principle parties have carbon copies of any information and we will include Chevron in our correspondence, etc. We do not want anything behind the scenes. We would like to share all information and asked Chevron to feel free to do the same.

The subject of delineation is important. Review of the K.W. Brown report shows there is obviously some contamination. It is not certain where the pit outlines are. From our perspective (Railroad Commission) we are interested in the delineation - where and what are the contaminants. The Railroad Commission does not consider itself a consultant to the operators. We are concerned with the final product - that whatever is chosen is effective.

Ernie - The NPS standpoint is we want to echo some of the things the state said. We don't want duplication of efforts over time. We have more guidelines. A letter from the Superintendent will be sent to Chevron stating our basic guidelines and what we would like to see addressed.

The first is physical site characteristics, (surface features, soil, climate, etc.) as it relates to the site. How that is done will be left up to Chevron.

The second area is chemical characterization (soil sediments,

surface & ground water and the dynamics of that).

As far as contaminant characterization are concerned, we would be interested in the types of constituents, the concentrations involved, related toxicities of the chronic and acute, any bio-accumulation capabilities and their persistence and mobilities.

The first major area is kind of an ARAR assessment. We are allowing Chevron to come up with an applicable ARAR's to this site. We need to see how clean is clean for this site.

Our primary drive here is that we are satisfying our responsibility for the federal trust.

It was emphasized that when Chevron supplies information we all want it to meet everyone's requirements and will be carbon copied to the other parties involved. Linda asked Chevron to send 3 copies of documents to her & she will distribute it to the NPS technical team.

John - The Railroad Commission does not anticipate sending out a letter. The commission's concerns are more general & they want to give the operator a chance to decide what is appropriate. Then we will review it and if Chevron needs more guidance then the commission will try to provide it.

Ernie - If there is a difference of opinion someone with the NPS will contact Chevron so things can be worked out. The NPS is giving Chevron the first shot in what level they feel is necessary to characterize the site. The ultimate goal of the NPS is to see that the site is cleaned up and that it does not present a hazard.

Eric - It would be helpful to know what NPS has identified at the site that is causing concern.

Ernie - We feel that they were inadequate. We need to compile into one document that reflects all of our comments and from there you can see where we're coming from.

Gary - From the K.W. Brown report that we know there was a release there and we know it's affecting some surface waters. When it was reviewed, we looked at it from a standpoint of this as a final assessment, but we also evaluated it against other questions. We think we should be looking at some expanded analysis.

Ernie - We are looking at one ground and one water sample of detail for the simple fact that there aren't other compounds that aren't acting in interference and it identifies target compounds. It might be to everyone's interest to expend a little extra in that first set of samples so we really know what type of problems we have.

determine how clean is clean. We will use the ARAR approach. By adequately assessing the site, Chevron can come to us with the criteria and we will either accept it or give comments. We will be reasonable, but we are also here to protect the interest of the Department of the Interior and the bureaus that are involved.