

PROJECT NOTE NO.		PROJECT NO.	
PN-0018-05 CLE-C01-01F018-I3-0016		01-F018-01	
CONFIRMATION OF:	CONFERENCE X	DATE HELD	26 November 1990
	TELECOM	DATE ISSUED	07 December 1990
	OTHER	RECORDED BY	Bijan Hagh/CH2M HILL
SUBJECT	Summary of Meeting with Regulatory Agencies to Discuss MCAS El Toro Sampling Strategies		
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)			
Refer to Page 4 for list of attendees.			
ACTION REQ'D. BY	ITEM		
	<p>The purpose of the meeting was to provide a forum for Agency representatives to discuss review comments and concerns regarding the RI/FS strategy at the sites at MCAS El Toro. A list of attendees is attached.</p> <ol style="list-style-type: none"> Larry Nuzum of the Navy opened the meeting by stating the goal of obtaining an overall RI/FS strategy agreeable to all parties. He suggested that sites where we were close to agreement be discussed first. The agencies preferred to discuss the sites one at a time, starting with Site 1. The RI/FS approach will include only two phases to meet the FFA schedule. The agencies expressed concern that the proposed Phase 1 soil sampling effort will not be sufficient to mitigate a major Phase 2 effort. They mentioned that they have concerns about the schedule since they believe a third phase may be necessary if the proposed Phase 1 soil sampling effort is implemented as is. The Navy mentioned potential resource constraints and that all parties had previously agreed that the regional groundwater VOC contamination would be emphasized for Phase 1 of RI. The regulators said that costs have not been included in the work plan and they are essentially "in the dark" regarding financial considerations. The Navy said that about \$3-4 million per year is budgeted for the MCAS El Toro RI/FS for the next three years. The agencies pointed out that the present work plan is missing the "why and how" rationale. They also asked for a more complete conceptual model. CH2M HILL said that a preliminary conceptual site model and risk assessment were not included in the work plan due to Navy decisions. CH2M HILL 		



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indicated that it had not been deemed appropriate to fully develop the conceptual model prior to Phase 1 of RI. The model will be updated as needed for Phase 2.

- 5. EPA stated that data collection should be focused to support the risk assessment and that Mr. Hiatt, EPA Region IX Toxicologist, has attached an example of an acceptable Risk Assessment Work Plan to his comments. The Navy responded that the primary focus of data collection activities was in fact the risk assessment.
- 6. Manny Alonzo of DHS said that he is not comfortable with a Phase 1 soil sampling program that includes sampling only the upper 5 feet at some sites. CH2M HILL said that the proposed Phase 1 soil sampling program is consistent with the data needs for the most likely remedial alternatives at these sites.
- 7. Walter Sandza of the Navy asked whether the existing sampling strategy would allow a site with no detects to be considered as "clean." The agencies replied that a different kind of sampling strategy is needed to demonstrate clean versus contaminated. In their view, Phase 2 will determine the extent of contamination or provide additional data indicating whether a site is clean.
- 8. Ken Williams of the RWQCB noted that the work plan proposes background samples near each site but none outside of the MCAS El Toro base boundaries. He questioned whether the "background" samples at each site are really background samples. CH2M HILL said that these onsite samples are better labeled as "upgradient" samples used for contaminant material balance and that the need for background samples offbase would be evaluated.
- 9. The agencies said that up-to-date site maps with scales need to be prepared. CH2M HILL stated that a proposal to survey the sites will be included in the revised work plan and the surveying work will be done as a subtask to the RFA (i.e., OU4).

The remainder of the discussion session was used to consider the sampling strategy on a site by site basis. The objective was to reach a consensus decision regarding the boundary, contaminants of concern, and the sampling approach/media for each site.

10. **Site 1: Explosive Ordnance Disposal Range.**

- o The agencies suggested using old aerial photos and geophysical techniques to locate the disposal trenches. CH2M HILL stated that the fence line will constitute the site boundary with the provision to modify based on photographs and geophysical information.
- o The agencies suggested that samples be analyzed for tentatively identified compounds such as nitrated toluenes. They also mentioned that the State MCL for vinyl chloride is 0.5 ppb, but the detection limit proposed is 1 ppb.

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CH2M HILL said that the proposed CLP analysis method utilizes GC/MS, and does not provide a detection limit that low. The proposed GC/MS, however, provides a higher level of confidence for contaminant identification than GC alone.

- o The agencies suggested collection of soil samples at the groundwater monitoring wells. CH2M HILL stated that there is little value in soil sampling at these locations since the wells are located outside of the suspected source area. CH2M HILL also stated that the analysis of multiple soil samples from the well locations (e.g., every 10 feet) is economically prohibitive.
- o Walter Sandza of the Navy mentioned the potential danger of unexploded ordnance and the presence of FS smoke at this site. Due to these health and safety concerns, he proposed that no onsite drilling and sampling be done under Phase 1.
- o The agencies suggested soil gas surveys to screen the location of contaminants. CH2M HILL replied that the previous soil gas surveys at MCAS El Toro have not rendered very useful data. It is also very likely that the volatiles have partitioned by now.

A consensus agreement regarding Phase 1 for Site 1: aerial photos and geophysical techniques such as GPR will be utilized early in Phase 1 RI to locate the disturbed areas and historical boundaries of the site. The proposed groundwater monitoring wells will be installed without soil sampling. Soil gas surveys were ruled out and soil sampling will be reserved for Phase 2.

11. Site 2: Magazine Road Landfill.

- o The agencies suggested vadose zone soil sampling in the landfill area. CH2M HILL stated that as a generic approach they have not proposed to sample within any landfills since vertical contaminant migration and health and safety are the major issues of concern.
- o The agencies said that analysis for tentatively identified compounds such as nitrotoluenes is needed. DHS suggested organic lead analysis be added. The Navy said that this is a subset of total lead analysis, and should not be required.

It was agreed to sample the soil (e.g., every ten feet) near the groundwater surface in the monitoring wells, and analyze one sample per well immediately above groundwater. If groundwater is not reached, then a sample of the bedrock/soil interface would be analyzed and the well completed just in case water levels rise.

This meeting was adjourned for the day.



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Larry Nuzum	"	619/532-1230
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