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ENVIRONMENTAL DIVISION
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MCAS EL TORO
SSIC # 5090.3

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Ser 1831.BR/627
July 25, 1994

Mr. John A. Hamill
United States Environmental Protection Agency
Region IX
Hazardous Waste Management Division, H-9-2
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: MARINE CORPS AIR STATION EL TORO

Dear Mr. Hamill:

This letter is in response to issues addressed in joint letters of 01 November 1993, 11 March 1994, and 10 May 1994 from the United States Environmental Protection Agency Region IX (EPA) and the State of California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control, Region 4, and Regional Water Quality Control Board, Santa Ana Region. This letter also responds to issues addressed in the EPA letter of 29 November 1993. Every issue has either been discussed or resolved in a past Remedial Project Manager (RPM) meeting, Data Quality Objective (DQO) meeting, or a topic specific meeting. The following is a review of each issue.

Request for Removal Action at Agua Chinon Wash (joint letter of 01 November 1993).

At the time of your request for a removal action at Agua Chinon Wash, MCAS El Toro had been recently listed as a Base Realignment and Closure (BRAC) III activity in late September 1993. BRAC III funds had not been made available at the time of your letter. Coincidentally, the City of Irvine was planning to commence their construction project at Agua Chinon Wash that Fall/Winter 1993 that would pave and realign the wash, which would significantly reduce the environmental migration of contaminants in that area.

MCAS El Toro BRAC III funds were secured in February 1994 and a scope of work was developed on 28 February 1994 that included a removal action at Agua Chinon Wash. A procurement meeting to discuss technical issues was held on 5 April 1994 with regulatory agency, Navy, and contractor representatives. A non-time critical removal action was mutually agreed upon by the BRAC Cleanup Team (BCT) to be the most appropriate course of action for Agua Chinon Wash. Soon afterwards, the contract task order (CTO) was awarded on 31 May 1994. The Navy is currently developing the Engineering Evaluation/Cost Analysis (EE/CA) in preparation of the Action Memorandum. The draft EE/CA is scheduled to be completed by October 1994; BRAC III funds have been budgeted for removal actions for fiscal year 1995.

Request for Timely Soil Gas Survey and Schedule (joint letters of 01 November 1993 and 11 March 1994).

In response to your proposal at the 06-07 July 1993 DQO meeting and your letter of 01 November 1994 requesting a timely soil gas survey at all Remedial Investigation/Feasibility Study (RI/FS) sites at El Toro, we incorporated soil gas technology in the Phase II RI/FS draft work plan at a portion of the RI/FS sites. Despite many complex technical issues, the Navy submitted the DQO and planning documents on schedule on 09 November 1993. A pilot field test at

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MCAS El Toro was completed by Target Environmental Services on 29 December 1993, with some of the agency team members attending that test.

At the 13 January 1994 RPM meeting, the group discussed the field test and numerous technical issues. The regulatory agencies were brought into the Navy's procurement process when they took as an action item the efforts to help and provide feedback to the Navy on the Technical Proposal to conduct the Site 24 soil gas investigation. The soil gas survey work plan approach was discussed on 10 February 1994 during a RPM meeting. The Navy negotiated the CTO modification on 22 February and made the award on 28 February 1994. A soil gas technical exchange meeting was set up on 01 March with the agencies. Your 11 March 1994 joint letter identified your concern that soil gas investigation had slipped a critical two weeks. On 14 March, the Navy proposed some schedule adjustments that allowed utility clearance and hence the soil gas field work to start two weeks earlier. An innovative technology for utility clearance was discussed at the 23 March 1994 RPM meeting. Since then the soil gas investigation has been more than a joint effort. The agency RPMs played a more active role than the Navy RPM; the group even adjusted the technical direction while remaining sensitive to budget constraints. The soil gas field work was completed on schedule with the draft report due September 1994.

Communications - RPM Conference Calls (EPA letter of 29 November 1993 and joint letter of 11 March 1994).

The EPA expressed concern that the weekly conference calls instituted had not been successful, and if the Navy still wished to pursue regular conference calls, that the Navy inform all the agencies in writing.

During the first few months under the BRAC III program, it was true that the Navy was not adequately staffed or attentive to constant team communications. Critical mandatory BRAC requirements with short fused deadlines were given higher priority.

In your joint letter of 11 March 1994, the agencies requested that the Navy re-establish the weekly conference calls as a means of improving communications.

At the 23-24 March RPM meeting, the 11 March joint letter was discussed with Jane Diamond of the EPA. The Navy agreed to re-establish conference calls among the BRAC Cleanup Team representatives (Navy, EPA, Cal-EPA) on a bi-weekly basis starting with 12 April 1994. Since that discussion, there have been eight calls scheduled. Most of the calls were mutually canceled by the BRAC Environmental Coordinator (BEC) and the agency members. The Navy has only missed the one scheduled call on 05 July 1994, and that was due to a personal crisis endured by the BEC. On all other occasions, the BRAC Cleanup Team (BCT) discussed issues in a different form of communication, or the conference call was attended by less than all BCT members. It should be noted that since 01 April, the team has also had numerous RPM and topic specific meetings and telephone conversations together.

The Navy is committed to team work and communications. With the newly added staff to support El Toro environmental investigations and remediation and the implementation of voice mail (environmental department only), team communication issues will diminish. We have implemented the following steps to improve communications: (1) The BRAC Environmental Coordinator will make weekly calls to the regulators even if a conference with all members cannot be

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scheduled; (2) A professional facilitator will support each BCT meeting; and (3) Our management will periodically check the effectiveness of telephone conferences and BCT meetings.

Release of Electronic Digitized Maps (EPA letter of 29 November 1993).

The EPA requested electronic copies of digitized maps of MCAS El Toro that were developed by the CLEAN I contractor. At the time, we anticipated our standard environmental management system, known as ITEMS, to be operational and accessible to all the agencies in the near term. As we had already provided electronic data to the EPA and it would be most appropriate to start utilizing the standard long-term electronic information transfer procedures after the holidays. In March 1994, we provided the EPA with the requested electronic maps.

OU-2 and -3 Schedule (joint letter of 11 March 1994).

At the 23-24 March RPM meeting, the 11 March joint letter was discussed. At that meeting, the team agreed to revisit the Federal Facility Agreement schedules for Operable Units (OUs) -2 and -3 in May 1994. In May, the Navy requested the regulatory agencies attend a 01 June 1994 meeting to discuss ground rules and time frames to allow individual environmental restoration project teams to restructure their regulatory agreement schedules due to mutually agreed reasons and/or good cause. Jane Diamond of the EPA attended that meeting. As an action item, the Navy will arrange for the El Toro team to meet and develop new, aggressive, realistic agreement schedules. This issue will be added to the agenda at the RPM meeting scheduled for 28 July 1994.

OU-1 Schedule (joint letter of 11 March 1994).

At the 23-24 March RPM meeting, the 11 March joint letter was discussed. At that meeting, the Navy RPM explained that to allow for appropriate review time of the primary documents under the FFA, including legal review, it was necessary to extend the schedule for the interim OU-1 Record of Decision (ROD) from December 1994 to June 1995; this still represents a draft ROD submittal nearly one year ahead of the current FFA schedule.

Transition from CLEAN I to CLEAN II for OUs-2 and -3 (joint letter of 11 March 1994).

In response to the concern about progress of the transition from the CLEAN I to the CLEAN II contract for OUs-2 and -3 you addressed in your 11 March 1994 letter, we attended a meeting on the subject in the EPA office in San Francisco on 28 March 1994. Our letter of 01 April 1994 addresses the agreements reached during that meeting with Jane Diamond, Christine Beach, and John Hamill of the EPA. The revision of the draft Phase II RI work plan began with the award of CTOs for the work plan and QA/QC support for the BCT.

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Addition of a Source Control Approach, OU-1 FS (joint letter of 10 May 1994).

Your request that a source control approach for groundwater extraction be evaluated as an alternative in the Feasibility Study (FS) was discussed at the 18 May 1994 RPM meeting. At that meeting, the Navy RPM summarized the following issues of concern that needed to be resolved: legal (point of compliance), cost, schedule impacts, procurement requirements, remedial alternatives associated with source control, impact on our Irvine Desalter Project Settlement Agreement with Orange County Water District (OCWD), and the need for additional groundwater modeling.

The Navy requested a special meeting with regulatory agency management and counsel on 15 June 1994 to discuss the issues raised in your joint 10 May 1994 letter. We felt it more appropriate to respond to such a pivotal issue in person. The 15 June 1994 meeting concluded that the shallow extraction wells being evaluated in Alternative #4 of the OU-1 Interim Action FS are close enough to the suspected source areas of the contaminated groundwater plume that an additional alternative with extraction wells in the source areas is not needed. In essence, our approaches differed only in terminology. The team reached all the goals of the meeting: (1) Agree to the definition of OU-1; (2) Understand the relationship among the FFA, the settlement agreement with OCWD for the Irvine Desalter Project, the OU-1 FS, and the OU-1 ROD; and (3) agreed on the strategy to proceed to a ROD (interim/final) for OU-1.

Capture of Off-Station Portion of the Groundwater Plume, OU-1 FS (joint letter of 10 May 1994).

Your request that the OU-1 FS address complete capture of the off-station groundwater plume was also discussed at both the 18 May 1994 and 15 June 1994 RPM meetings. We are re-evaluating the entire capture issue at the "toe" of the plume in the area of Culver Drive not only with our groundwater modeling and in the FS, but also on may impact to our settlement agreement on the Irvine Desalter Project.

If you should have any questions concerning this response, please contact me at our MCAS El Toro BRAC Environmental office (714) 726-3470.

Sincerely,



BRET K. RAINES
By direction of
the Commanding Officer

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