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NAVAL FACILITIES ENGINEERING COMMAND
ENVIRONMENTAL DIVISION
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MCA

M60050.000753
MCAS EL TORO
SSIC # 5090.3

5090
Ser 1853.VG/178
March 10, 1994

Mr. Joe J. Zarnoch
Project Manager
State of California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Site Mitigation Branch
245 Broadway, Suite 350
Long Beach, CA 90802-4444

Re: FEASIBILITY STUDY (FS) FOR OPERABLE UNIT (OU) 1,
MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Zarnoch:

The purpose of this letter is to confirm the following points of agreement that were reached by the MCAS El Toro team during the Remedial Managers' meeting of February 9, 1994 regarding the OU-1 FS at MCAS El Toro. The meeting minutes will be submitted under separate cover.

1. Definition of OU-1:

OU-1 is defined as "groundwater on and off Station that is contaminated with constituents that have migrated from sites at MCAS El Toro."

2. Geographic extent of OU-1:

Based on the results of the Phase I Remedial Investigation (RI) the geographic extent of OU-1 includes groundwater represented by the plumes of volatile organic compounds (VOCs) emanating from sites in the southwest quadrant of the Station. More specifically, this includes groundwater in the vicinity of RI/FS Sites 7, 8, 9, 10, 12, 13, 14, 15, 21, and 22 and groundwater down-gradient of the Station.

3. Contaminants addressed in OU-1:

Based on the results of the Phase I RI, only VOCs meet the definition of OU-1. Specifically, the following contaminants will be addressed in the OU-1 RI/FS:

1,1,2-Trichloroethane	1,1-Dichloroethene
1,2-Dichloroethane	1,2-Dichloroethene
Carbon tetrachloride	Benzene
Chloromethane	Ethylbenzene
Toluene	Tetrachloroethene
Xylene	Trichloroethylene (TCE)

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Although not all the VOCs listed above have been detected in the regional groundwater plume represented by TCE (or the smaller benzene plume in the vicinity of Sites 13, 14, and 15) they have been detected in the southwest quadrant of the Station and are addressed in OU-1 as a group, because of similar physical and chemical properties that affect their fate and transport in the environment and their treatability in extracted groundwater.

4. Approach to Remedial Action for OU-1:

OU-1 will not address remediation of the source(s) of VOCs in groundwater. Additional investigation and remediation of source areas will be performed in Phase II of the RI/FS and under other concurrent environmental programs at the Station, such as the investigation of the contaminant source(s) in the vicinity of Sites 13, 14, and 15 under the California Leaking Underground Fuel Tank (LUFT) regulations.

The OU-1 FS will evaluate: (1) hydraulic containment of the shallow groundwater contaminated with higher levels of VOCs in the southwest quadrant of the Station, and (2) containment and reduction of VOC concentrations in groundwater in the main production aquifer of the Irvine Subbasin by the Desalter project.

5. Scope of Alternatives Discussed in FS:

The FS will address the following alternatives:

- (1) No Action (e.g, current conditions);
- (2) OCWD Desalter Project (e.g., without involvement by DON);
- (3) OCWD Desalter Project and 3 shallow extraction wells in the southwest quadrant of MCAS El Toro; extracted groundwater piped to the Desalter without pretreatment;
- (4) OCWD Desalter Project and 3 shallow extraction wells in the southwest quadrant of MCAS El Toro; extracted groundwater will be pretreated to remove VOCs before piping to Desalter;

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- (5) OCWD Desalter Project and 7 shallow extraction wells in the southwest quadrant of MCAS El Toro; extracted groundwater piped to the Desalter without pretreatment;
- (6) OCWD Desalter Project and 7 shallow extraction wells in the southwest quadrant of MCAS El Toro; extracted groundwater will be pretreated to remove VOCs before piping to Desalter.

(Based on groundwater and solute transport modelling currently underway, the actual number of wells in alternatives 3 through 6 may change.)

6. Interim Record of Decision (ROD):

Because the investigation of groundwater at MCAS El Toro is not complete, the parties to the MCAS El Toro Federal Facilities Agreement (FFA) agreed that the above definition and approach are valid only to reach an Interim ROD.

7. Schedule for OU-1 Activities:

As you know, the Department of Navy has advocated the acceleration of OU-1 schedule to reach a Record of Decision well before the FFA deadline of December 29, 1995. The principal impetus for this decision is to coordinate the remedial response identified for OU-1 with the scheduled construction and operation of the OCWD Irvine Desalter facility in 1995 and early 1996. Based on this situation, we have developed a proposed schedule (enclosed).

The MCAS El Toro team agreed that the proposed schedule will reflect the terms of the FFA, and appropriate time for review of primary documents will be provided to the parties of the FFA. We would appreciate your cooperation in executing this schedule.

Please be advised that we are extending, by 30 days, the 60-day time for issuing each of the draft final primary documents as provided in section 7.7(g) of the FFA. This extension of time is needed to address the complex multi-party negotiations involved.

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If you have questions about this letter please contact me at
(619) 532-2635.

Sincerely,



F. ANDREW PISZKIN
Remedial Project Manager
By direction of
the Commanding Officer

Encl:
(1) Schedule

Identical letters to:

Mr. John Hamill
Project Manager
U.S. Environmental Protection Agency
Federal Facilities Cleanup Officer (H-9-2)
75 Hawthorne Street
San Francisco, CA 94105

Mr. John Broderick
State of California Environmental Protection Agency
Santa Ana Regional Water Quality Control Board, Region 8
2010 Iowa Avenue, Suite 100
Riverside, Ca 92507-2409

Copy to:
Commanding General
Attn: Vish Parpiani
Environmental Department, IAU
MCAS El Toro
Santa Ana, CA 92709

SCHEDULE FOR OU-1 ACTIVITIES, MCAS EI TORO

Deliverable	Week	MONTHS - 1994					MONTHS - 1994					MONTHS - 1995										
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	
RI	1		CH2MHill	CH2MHill	CH2MHill	Navy	CH2MHill	Reg.Agcy	Reg.Agcy	CH2MHill	CH2MHill											
	2		drft RI	drftRI	drft RI	Review	Revise	Review	Review	drft fin	drft fin	CH2MHill										
	3		" "	" "	" "	" "	drft RI	" "	" "	" "	Navy rev											
	4		" "	" "	" "	" "	Reg.Agcy	" "	" "	" "	" "											
FS (includes ARARs & Risk Assessment)	1		CH2MHill	ARAR Ltr	Reg.Agcy	CH2MHill	drft FS	CH2MHill	Reg.Agy	Reg.Agy	CH2MHill											
	2		drft FS	Reg.Agcy	ARAR Resp	drft FS	Navy	Revise	Review	Review	drft.fin	CH2MHill										
	3		" "	Response	CH2MHill	" "	Review	drft FS	" "	" "	" "											
	4		" "	to Ltr	drft FS	" "	" "	Reg.Agcy	" "	" "	" "											
Proposed Plan	1					CH2MHill	CH2MHill	CH2MHill	Navy rev	Reg.Agy												
	2					draft PP	drft	drft	drft pp	CH2MHill	review	Reg.Agy										
	3					" "	PP	PP	Navy rev	revise	" "	Reg.Agy										
	4					" "	" "	" "	" "	drft pp	" "	" "										
ROD	1							CH2MHill	CH2MHill	CH2MHill												
	2							d.IntROD	d.IntROD	d.IntROD	d.Int.	Reg.Agy										
	3						CH2MHill	" "	" "	" "	ROD	Reg.Agy										
	4						d.Int ROD	" "	" "	" "	Navy rev.	Review										
RD/RA	1																					
	2																					
	3																					
	4																					
OCW Desaiter	1		Begin																			
	2		Design																			
	3		Work																			
	4						Cost Report															
DON Negotiations	1		Tech Mtg			CH2MHill	CH2MHill															
	2		w/ OCWD			Eval	Cost															
	3					OCWD	Alloca															
	4					Costs	Analysis															

Date Prepared: 2/18/94