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JACOBS ENGINEERING GROUP INC.

M60050.000854
MCAS EL TORO
SSIC # 5090.3

CLEAN TRANSMITTAL/DELIVERABLE RECEIPT

CONTRACT N-68711-89-D-9296

DOCUMENT CONTROL NO.: CLE-C01-1E018-13-0014

TO: Mr. Herb Padro
Contracting Officer, Code 0213
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

DATE: 05 November 1990
CTO#: 0018
LOCATION: MCAS El Toro
TASK/WORK ELEMENT: _____

FROM: Edward Rogan
Ed Rogan
Project Manager

Philip J. Stassi
Philip J. Stassi
Program Manager

DESCRIPTION: Project Note # PN-0018-03 - Interim Review of Work Plan Documents Regulatory Agencies
Question and Answer Session

TYPE: Contract Deliverable CTO Deliverable Request For Change/
Project Note

CATEGORY: Preliminary Draft Preliminary Final
 Draft Final

SCHEDULED DELIVERY DATE: N/A ACTUAL DELIVERY DATE: _____

Number of Copies Submitted: _____

Copies To: J. Swansen - Code 0213.JS w/attachments File - PMO
J. Pavlisch - Code 184 w/attachments File - PAS
L. Nuzum - Code 1811.LN w/attachments File - CTO Notebook
W. Sandza - Code 1811.WS w/attachments _____
M. Rehor - Activity POC _____

Delivered To: Contracting Officer RPM/I
Name: _____

TITLE: CTO 0018 INTERIM REVIEW OF WORK PLAN
DOCUMENTS REGULATORY AGENCIES
QUESTION AND ANSWER SESSION

AUTHOR: CH2M HILL

DATE: 11/05/90

CATEGORY: 3.3

PROJECT NOTE NO. PN-0018-03		PROJECT NO. 01-F018-01	
CONFIRMATION OF:	CONFERENCE X TELECOM OTHER	DATE HELD DATE ISSUED RECORDED BY PLACE	25 October 1990 5 November 1990 CH2M HILL MCAS EI Toro
SUBJECT	CTO #0018 Interim Review of Work Plan Documents Regulatory Agencies Question and Answer Session		
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)			
J. George Martires/MCAS EI Toro Ed Rogan/CH2M HILL Walter Sandza/SOUTHWESTNAVFACENGCOM Joanna Zinni/CH2M HILL Julie Anderson/EPA Region IX Sebastian Tindall/SAIC Gary Stewart/RWQCB Andrew Bain/EPA Region IX Michael Rehor/MCAS EI Toro Larry Nuzum/SOUTHWESTNAVFACENGCOM		Jim Goodrich/OCWD Chuck Elliott/CH2M HILL Mike Arends/CH2M HILL Manny Alonzo/DHS/TSCP John Hamill/EPA Region IX Roy Herndon/OCWD Laurie Mann/EPA Region IX Joe Ruzicska/MCAS EI Toro Claire Best/DHS	
ACTION REQ'D. BY	ITEM		
	<p>The purpose of this meeting was to provide a forum for Agency representatives to discuss major review comments and concerns regarding the draft versions of the RI/FS Work Plan (WP), Sampling and Analysis Plan (SAP), Quality Assurance Project Plan (QAPP), and Community Relations Plan (CRP) for MCAS EI Toro.</p> <p>1. CRP. EPA said the CRP, overall, looked professional. The following are significant general comments offered by the Agencies. Specific comments (page and section references) have not been listed with these notes, but were discussed at the meeting and are expected to be included with the Agencies' formal comments. EPA plans to finalize and transmit written comments for the CRP in about two weeks. DHS provided written comments to the Navy at the meeting.</p> <ul style="list-style-type: none"> o Add TCE, VOC, ferrocene, and other compounds to the glossary. Define "downgradient" in text. o The vicinity map needs more detail, such as city limits, major streets, area covered by plume, and distance to wells. The map showing individual sites is hard to read. o Add a flow chart describing the Superfund process (EPA will provide the Navy with an example). Also describe RD/RA and maintenance phases of the process. Mention the major parties in the FFA. 		

PROJECT NOTE NO. PN-0018-03	PROJECT NO. 01-F018-01
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ACTION REQ'D. BY	ITEM
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	<ul style="list-style-type: none"> o Expound upon the known threat to drinking water. Show downgradient (threatened) drinking water wells. Mention the Irvine desalter. Discuss the potential prevention of beneficial use of Irvine sub-basin as a drinking water source. o Clean up or simplify technical language, and eliminate acronyms, where possible. Shorten the section on the history of Irvine. o Review the questionnaires to provide information such as the most popular newspapers and television stations, other environmental concerns of community members, and proportion of on- and off-base personnel interviewed. Include a sample questionnaire in the CRP. o Consider having a kickoff public meeting and distributing a fact sheet after completion of the WP. A kickoff prior to implementation of RI work would be appropriate for this project. o State whether the schedule and number of fact sheets and meetings applies to the whole site or to each operable unit (OU). Each OU may have different dates and requirements for fact sheets. o Consider quarterly meetings and increasing membership of the TRC. <p>The Navy pointed out that since TRCs are a DOD (as opposed to NCP) requirement, they should not be considered community relations activities, and should be focused on technical exchange.</p> <p>2. QAPP. Since the Contract Laboratory Program (CLP) contract per se will not be used, some of the QAPP items need to be clarified. Just because samples are sent to a CLP lab doesn't guarantee CLP-quality results. The CLP references were also confusing to the Navy. The data validation procedures and detection limits need elaboration. For clarification of comments, CH2M HILL can contact Laurie Mann/EPA Region IX.</p> <p>The Navy is concerned that appropriate guidance for QAPP preparation might not have been used, and requested that CH2M HILL check on guidance for document preparation for PRP-lead sites.</p> <p>3. RI/FS WP and SAP. Major issues discussed for the WP and SAP are summarized below.</p> <ul style="list-style-type: none"> o Risk Assessment. EPA provided a handout with examples of what elements of a risk assessment work plan should be included. SAIC suggested doing an "up front" risk assessment based on all chemicals; this would give more confidence to the sampling approach. SAIC also suggested new record searches and an attempt to define a mass balance of contaminants. o Sample Types. DHS questioned the soil sampling depths, whether soil gas sampling would be useful, and whether soil sampling was planned for GW wells.
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PN-0018-03		01-F018-01
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MA	<ul style="list-style-type: none"> o WP Organization. The Agencies felt that insufficient detail was provided about the objectives and content for Phase 1 and Phase 2 of the RI/FS. The WP should specify how Phase 1 data are to be used. A decision tree showing the phased approach would be helpful. For example, if contamination is not detected in initial investigations, Phase 2 work would be designed to confirm the absence of contamination. If contamination is detected in Phase 1, the goal of the next phase would be to characterize its extent. The Agencies asked if they would be in on the review of the proposed work for Phase 2. The Navy pointed out that a Work Plan Amendment would be issued for Phase 2, and that the schedule in the WP allows for a review period by the Agencies. o The WP and SAP present information according to site number without adequate reference to the corresponding OU number. o An Agency concern was that Phase 1 should include the collection of more soil samples. EPA suggested that the Navy and the Agencies meet to review the proposed soil sampling on a site-by-site basis. The Navy expressed concern that this effort might interfere with the schedule for investigation of OU-1 (regional groundwater contamination). EPA said that the proposed changes should be minor. o DHS said that the list of State ARARs is incomplete. DHS will provide a sample list to aid in completing this section. o OCWD Wells. The Navy is considering taking on the collection of samples and measurement of water levels in the OCWD wells. Of the OCWD wells, the TIC wells are irrigation wells, and the MCAS wells are monitoring wells. An evaluation of the wells for inclusion into the MCAS El Toro RI/FS will need to be done. o The Agencies do not believe that OCWD has adequately delineated the downgradient extent of the plume. Since the plume is still moving, it has not necessarily been adequately defined downgradient. o Detection limits and method differences may become important as risk assessment issues. <p>EPA passed out a copy of SAP comments prepared by an EPA hydrogeologist.</p> <p>4. Submission of Comments. Final comments will probably be available in writing from the Agencies by about 12 November 1990.</p> <p>The Navy pointed out that the "clock" starts on a 30-day revision period (FFA) when comments are received from the Agencies. It may therefore be preferable that the Agencies issue "draft" comments, and address them to Larry Nuzum.</p> <p>5. Future Meeting Dates. 26 and 27 November were tentatively set aside for discussion of soil sampling strategy on a site-by-site basis. The meetings may be held in CH2M HILL's Santa Ana office.</p>	

LIST OF ATTENDEES

Q & A SESSION
MCAS EL TORO

10/25/90

<u>NAME</u>	<u>ORGANIZATION</u>	<u>PHONE NO</u>
✓ J. GEORGE MARTINEZ	MCAS EL TORO	714-726-370
Jim Goodrich	ORANGE COUNTY WATER DISTRICT	714-963-5661
Ed Logan	CH2M HILL	(619) 250-5500
Chuck Elliott	CH2M HILL	(916) 920-0300
Mike Arends	CH2M HILL	(714) 250-5500
WALTER SANDZA	SOUTHWEST NAUFACENG.COM	619-532-2449
Joanna Zimmie	CH2M HILL	714/250-5500
Manny Alonge	DHS/TSCP REG. 4	213/590-4904
✓ Liz Anderson	EPA, Region 9, Superfund	415/744-2384
John Hamill	EPA, Region 9	(415) 744-2391
SEBASTIAN TINDALL	SAIC (EPA Contractor)	(415) 399-0140
ROY HERNDON	Orange County Water District	(714) 693-8167
Barry Stewart	Regional Water Quality Control Board	(714) 762-4130
Laurie B. Mann	EPA, Region 9, QA	(415) 744-1497
Andrew Bein	"	(415) 744-2184
JOE RUCICSUKA	MCAS EL TORO	714
Glenn Burt	DHS - Region 9	726-282
Larry L. Nugent	SOUTHWEST NAUFACENG.COM	(213) 590-4949
Michael W. Rehor	MCAS EL TORO	(619) 532-1230
		(714) 726-2821

JACOBS ENGINEERING GROUP INC.

MEMORANDUM

TO: Larry Nuzum, RPM
Southwest Division/San Diego

DATE: 16 November 1990

FROM: Edward Rogan/CH2M HILL

SUBJECT: Subcontract No. 01-F000-89-0002
Navy CLEAN - Southwest Division
CONTRACT TASK ORDER #0018
Interim Review of Work Plan Documents
Regulatory Agencies Question and Answer Session

On 25 October 1990 a Regulatory Agency Question and Answer Session was held at the MCAS El Toro. The purpose of this meeting was to provide a forum for Agency representatives to discuss major review comments and concerns regarding the draft versions of the RI/FS Work Plan (WP), Sampling and Analysis Plan (SAP), Quality Assurance Project Plan (QAPP), and Community Relations Plan (CRP) for MCAS El Toro.

1. CRP. EPA said the CRP, overall, looked professional. The following are significant general comments offered by the Agencies. Specific comments (page and section references) have not been listed with these notes, but were discussed at the meeting and are expected to be included with the Agencies' formal comments. EPA plans to finalize and transmit written comments for the CRP in about two weeks. DHS provided written comments to the Navy at the meeting.
 - o Add TCE, VOC, ferrocene, and other compounds to the glossary. Define "downgradient" in text.
 - o The vicinity map needs more detail, such as city limits, major streets, area covered by plume, and distance to wells. The map showing individual sites is hard to read.
 - o Add a flow chart describing the Superfund process (EPA will provide the Navy with an example). Also describe RD/RA and maintenance phases of the process. Mention the major parties in the FFA.

- o Expound upon the known threat to drinking water. Show downgradient (threatened) drinking water wells. Mention the Irvine desalter. Discuss the potential prevention of beneficial use of Irvine sub-basin as a drinking water source.
- o Clean up or simplify technical language, and eliminate acronyms, where possible. Shorten the section on the history of Irvine.
- o Review the questionnaires to provide information such as the most popular newspapers and television stations, other environmental concerns of community members, and proportion of on- and off-base personnel interviewed. Include a sample questionnaire in the CRP.
- o Consider having a kickoff public meeting and distributing a fact sheet after completion of the WP. A kickoff prior to implementation of RI work would be appropriate for this project.
- o State whether the schedule and number of fact sheets and meetings applies to the whole site or to each operable unit (OU). Each OU may have different dates and requirements for fact sheets.
- o Consider quarterly meetings and increasing membership of the TRC.

The Navy pointed out that since TRCs are a DOD (as opposed to NCP) requirement, they should not be considered community relations activities, and should be focused on technical exchange.

2. QAPP. Since the Contract Laboratory Program (CLP) contract per se will not be used, some of the QAPP items need to be clarified. Just because samples are sent to a CLP lab doesn't guarantee CLP-quality results. The CLP references were also confusing to the Navy. The data validation procedures and detection limits need elaboration. For clarification of comments, CH2M HILL can contact Laurie Mann/EPA Region IX.

The Navy is concerned that appropriate guidance for QAPP preparation might not have been used, and requested that CH2M HILL check on guidance for document preparation for PRP-lead sites.

3. RI/FS WP and SAP. Major issues discussed for the WP and SAP are summarized below.

- o Risk Assessment. EPA provided a handout with examples of what elements of a risk assessment work plan should be included. SAIC suggested doing an "up front" risk assessment based on all chemicals; this would give more confidence to the sampling approach. SAIC also suggested new record searches and an attempt to define a mass balance of contaminants.

- o Sample Types. DHS questioned the soil sampling depths, whether soil gas sampling would be useful, and whether soil sampling was planned for GW wells.
- o WP Organization. The Agencies felt that insufficient detail was provided about the objectives and content for Phase 1 and Phase 2 of the RI/FS. The WP should specify how Phase 1 data are to be used. A decision tree showing the phased approach would be helpful. For example, if contamination is not detected in initial investigations, Phase 2 work would be designed to confirm the absence of contamination. If contamination is detected in Phase 1, the goal of the next phase would be to characterize its extent. The Agencies asked if they would be in on the review of the proposed work for Phase 2. The Navy pointed out that a Work Plan Amendment would be issued for Phase 2, and that the schedule in the WP allows for a review period by the Agencies.
- o The WP and SAP present information according to site number without adequate reference to the corresponding OU number.
- o An Agency concern was that Phase 1 should include the collection of more soil samples. EPA suggested that the Navy and the Agencies meet to review the proposed soil sampling on a site-by-site basis. The Navy expressed concern that this effort might interfere with the schedule for investigation of OU-1 (regional groundwater contamination). EPA said that the proposed changes should be minor.
- o DHS said that the list of State ARARs is incomplete. DHS will provide a sample list to aid in completing this section.
- o OCWD Wells. The Navy is considering taking on the collection of samples and measurement of water levels in the OCWD wells. Of the OCWD wells, the TIC wells are irrigation wells, and the MCAS wells are monitoring wells. An evaluation of the wells for inclusion into the MCAS El Toro RI/FS will need to be done.
- o The Agencies do not believe that OCWD has adequately delineated the downgradient extent of the plume. Since the plume is still moving, it has not necessarily been adequately defined downgradient.
- o Detection limits and method differences may become important as risk assessment issues.

EPA passed out a copy of SAP comments prepared by an EPA hydrogeologist.

4. Submission of Comments. Final comments will probably be available in writing from the Agencies by about 12 November 1990.

The Navy pointed out that the "clock" starts on a 30-day revision period (FFA) when comments are received from the Agencies. It may therefore

be preferable that the Agencies issue "draft" comments, and address them to Larry Nuzum.

5. Future Meeting Dates. 26 and 27 November were tentatively set aside for discussion of soil sampling strategy on a site-by-site basis. The meetings may be held in CH2M HILL's Santa Ana office.

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cc: File - PMO
File - Pas
File - Chron
CTO Notebook

ATTACHMENT A

INTERIM REVIEW OF WORK PLAN DOCUMENTS
 REGULATORY AGENCIES QUESTION AND ANSWER SESSION
 25 OCTOBER 1990
 MCAS EL TORO

Name	Organization	Phone
Walter Sandza	SOUTHWESTNAVFACENGCOM	619/532-1230
Larry Nuzum	SOUTHWESTNAVFACENGCOM	619/532-1230
Joanna Zinni	CH2M HILL	714/250-5500
Mike Arends	CH2M HILL	714/250-5500
Julie Anderson	EPA Region IX	415/744-2384
John Hamill	EPA Region IX	415/744-2391
Laurie Mann	EPA Region IX	415/744-1497
Andrew Bain	EPA Region IX	415/744-2184
Sebastian Tindall	SAIC	415/399-0140
Roy Herndon	OCWD	714/693-8167
Gary Stewart	RWQCB	714/782-4130
Joe Ruzicska	MCAS El Toro	714/726-2821
Michael Rehor	MCAS El Toro	714/726-2821
Claire Best	DHS	213/590-4949
Manny Alonzo	DHS/TSCP	213/590-4904
J. George Martires	MCAS El Toro	714/726-3701
Ed Rogan	CH2M HILL	714/250-5500
Jim Goodrich	OCWD	714/963-5661
Chuck Elliott	CH2M HILL	916/920-0300