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MCAS EL TORO  
SSIC # 5090.3

# CLEAN TRANSMITTAL/DELIVERABLE RECEIPT

CONTRACT N-68711-89-D-9296

DOCUMENT CONTROL NO.: CLE-C01-01F145-I2-0014

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

DATE: 23 January 1992  
CTO#: 0145  
LOCATION: MCAS EI Toro  
TASK/WORK ELEMENT: \_\_\_\_\_

FROM: *John Dolegowski*  
John Dolegowski/Project Manager

*M. W. Rogan for*  
Edward J. Rogan/Resource Center Manager

DESCRIPTION: PN-0145-08 - Meeting with Regulatory Agencies Marine Corps Air Station El Toro, Orange County, California Remedial Investigaton/Feasibility Study Phase I

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

CATEGORY:    Preliminary Draft         Draft         Preliminary Final         Final

SCHEDULED DELIVERY DATE: \_\_\_\_\_        ACTUAL DELIVERY DATE: \_\_\_\_\_

Number of Copies Submitted: \_\_\_\_\_

Copies To:	<u>T. Young - Code 1841 w/attach</u>	<u>File - PMO w/attach</u>
	<u>A. Piszkin - Code 1812.AP w/attach</u>	<u>File - CTO Notebook/PMO w/attach</u>
	<u>D. Wilson - Code 0232.DW w/attach</u>	<u>File - Pas w/attach</u>
	<u>A. Vela - JEG/Pas w/attach</u>	<u>File - CTO Notebook/Pas w/attach</u>
	<u>K. Tomeo - CH2M HILL w/attach</u>	<u>File - CH2M HILL w/attach</u>
	<u>E. Rogan - CH2M HILL w/attach</u>	

Delivered To: Contracting Officer \_\_\_\_\_        RPM/EIC \_\_\_\_\_        Date/Time Received

Name: \_\_\_\_\_        TITLE: MEETING WITH REGULATORY AGENCIES  
RI/FS PHASE I

AUTHOR: JOHN DOLEGOWSKI/CH2M HILL

DATE: <sup>23</sup>02/22/92

CATEGORY: 1.5

PROJECT NOTE NO. PN-0145-08 CLE-C01-01F145-I2-0014		PROJECT NO. 01-F145-H6
CONFIRMATION OF:	CONFERENCE TELECOM OTHER                    X	DATE HELD    13, 14 November 1991 DATE ISSUED   22 January 1992 RECORDED BY J. Dolegowski/CH2M HILL PLACE            MCAS El Toro
SUBJECT	Meeting With Regulatory Agencies Marine Corps Air Station El Toro Orange County, California Remedial Investigation/Feasibility Study Phase I	
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)  <p style="text-align: center;">See Page 9</p>		
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	Representatives of the Marine Corps Air Station (MCAS) El Toro; Naval Facilities Engineering Command - Southwest Division (SOUTHWESTDIV); Orange County Water District (OCWD); CH2M HILL; the U.S. Environmental Protection Agency (EPA); the California Department of Toxic Substances Control (DTSC); and the California Regional Water Quality Control Board; Santa Ana Region (RWQCB), met at MCAS El Toro at 0900 hours on 13 and 14 November 1991. These meeting minutes (prepared by CH2M HILL and reviewed by SOUTHWESTDIV) provide a summary of the major points of discussion, significant decisions reached during the meeting, and a list of action items.  The topics of discussion at the meeting were:  <b>13 November 1991</b> <ul style="list-style-type: none"> <li>o Update on progress since last agency meeting held on 11 and 12 September 1991</li> <li>o Preparations for MCAS El Toro Community Relations Public Forum</li> <li>o Review of past action items</li> <li>o Pesticide/herbicide analyses</li> <li>o Protocol to affect changes in procedures for the Remedial Investigation/Feasibility Study (RI/FS)</li> <li>o Review of U.S. Navy (Navy) documents</li> <li>o OCWD Irvine Desalter Project</li> </ul>	



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measures, and cost sharing for the Irvine Desalter when the agreement has been completed.

- o The Navy will send to EPA a copy of the preliminary soils investigation in Agua Chinon Wash when received from the City of Irvine.
- o The City of Irvine will send a copy of their work plan for preliminary soil sampling to LCDR Serafini.
- o The Navy should state when they are willing to commit to cost sharing of the Irvine Desalter.

**UPDATE ON PROGRESS SINCE LAST MEETING**

John Dolegowski/CH2M HILL discussed the progress on Contract Task Order (CTO) No. 0145 since the last agency meeting held on 11 and 12 September 1991 and distributed a handout summarizing the progress. Comments provided during the meeting are summarized below.

Task A - Review Aerial Photographs, Site Surveys, and Topographic Maps

Sebastian Tindall/SAIC asked about the progress reviewing the historical aerial photographs of MCAS El Toro received from EPA. John Dolegowski/CH2M HILL responded that review of the photographs will be delayed until funding for Phase I is received. S. Tindall asked for a presentation showing the boundaries of the current RI/FS sites developed by J. M. Montgomery and Associates, present locations of samples, and areas of concern. EPA wants a map showing site boundaries and sampling locations that will be updated on a regular basis as new information becomes available. LCDR Serafini asked that the maps be prepared for the next agency meeting.

John Hamill/EPA stated that the Sampling Plan is a living document that needs to be flexible to accommodate changing conditions. This view was shared by all. Manny Alonzo/DTSC asked how changes in field work could be accommodated. LCDR Serafini suggested having an environmental COTAR on-Station to facilitate changes. J. Dolegowski expressed concern about the speed at which additional scope could be added to the contract due to the required Navy contracting procedures. S. Tindall stated that EPA will want to see the standard operating procedures (SOPs) and complete onsite audits during the field work. M. Alonzo stated that there would be not problem adding samples, but a reduction of scope would require agency approval. LCDR Serafini stated that the Remedial Officer in Charge of Construction (ROICC) will be able to make some of the field decisions.

Task D - Waste Management Plan (WMP)

J. Dolegowski proposed finalizing the Draft WMP with the conclusions agreed upon with the agencies during the last meeting, and incorporating future changes to the WMP as addenda. The Final WMP will be submitted to the Navy in mid-December. J. Hamill distributed two documents reviewing the Draft WMP with respect to state regulations and Resource Conservation and Recovery Act of 1976 (RCRA) regulations.



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and herbicides will be present in MCAS El Toro land previously leased for agriculture and that pesticides used for agricultural purposes are not CERCLA (Superfund) or RCRA waste. Therefore, the Navy should not analyze for pesticides/herbicides. M. Alonzo stated that DDT is exempt from RCRA when applied during the course of normal agricultural practices. LCDR Serafini stated that pesticides/herbicides would not be problem unless encountered in concentrations substantially above background levels. Background levels would have to be subtracted. Background samples should be taken in agricultural areas. EPA stated that they would notify the Navy of which sites should be analyzed for pesticides/herbicides. It was agreed that CH2M HILL would develop a plan to sample background levels of pesticides/herbicides in Irvine.

**PROTOCOL TO AFFECT CHANGES IN PROCEDURES FOR THE RI/FS**

Decisions agreed upon at agency meetings will be documented in the formal meeting notes. The meeting notes will be distributed to all attendees. The regulatory agencies will comment only if they do not agree with the statements/conclusions in the notes. Comments will be sent to Andy Piszkin/SOUTHWESTDIV and J. Dolegowski simultaneously. EPA will divide comments into two categories: fatal and minor. If comments are not received within 30 days or the next meeting (which ever is longer), then the decisions documented in the meeting notes becomes binding.

**REVIEW OF NAVY DOCUMENTS**

LCDR Serafini stated that in the MCAS El Toro agreement with the State of California, the Navy had paid for 2.5 man-years of technical labor for review of National Priority List site documents. He wants to make sure that DTSC and RWQCB respond to MCAS El Toro's needs and provide the services that the Navy have paid for.

**OCWD IRVINE DESALTER PROJECT**

LCDR Serafini stated that the Navy may request CH2M HILL to develop an independent cost estimate for the OCWD Desalter Project. LCDR Serafini asked SOUTHWESTDIV to give CH2M HILL the task of developing the cost estimate. Roy Herndon/OCWD replied that the Engineering-Science Report is a feasibility study analysis. If more detail is needed to complete an independent cost estimate, OCWD would be happy to provide the information. A. Piszkin stated that the Navy would like to evaluate using a similar groundwater extraction and treatment project for the Barstow and Pendleton sites.

R. Herndon asked that the Navy include OCWD's investigation costs and interim measures costs (extraction well ET-1 and treatment plant) with the Navy's agreement for the cost of the Irvine Desalter. J. Hamill asked when the agreement would be received. LCDR Serafini stated that he will send a copy to J. Hamill when the agreement has been prepared.

**EXTENSION AND LINING OF AGUA CHINON WASH**

The City of Irvine (represented by K. Shawn Thompson and Russ Thiele) and the Irvine Company (represented by Mike Padian) presented a proposal to construct a box culvert for the Agua Chinon Wash under the railroad tracks east of MCAS El Toro and

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to relocate and line Agua Chinon Wash for a distance of 550 feet into MCAS El Toro. An additional rail line and passenger platform will be added to the existing tracks. The purpose of improving the channel is to improve flow into the box culvert. The existing flood control system at Agua Chinon Wash is restrictive at the entrance to the culvert. The City of Irvine would like to get this project under way as soon as possible due to concern about erosion of the existing culvert under the railroad tracks. The work is divided into two phases. Phase I includes the box culver and 100 feet of lined channel. Phase II includes 550 feet of lined channel. The City of Irvine would like to bid construction of Phase I in March 1992 and start construction in April 1992.

The City of Irvine has hired Camp, Dresser, and McKee to complete three test borings in the culvert and to analyze the soil samples for the same list of chemicals listed in the MCAS El Toro Sampling Plan. The City of Irvine agreed to send MCAS El Toro a copy of the results of this preliminary investigation when the report is received in approximately three weeks.

S. Tindall expressed concern that if the sediments beneath the existing drainage channel are contaminated, then the construction activities for Agua Chinon Wash would prevent the opportunity for future sampling, may result in contaminated soil being moved to a new location, and may prevent future remediation. M. Alonzo expressed concern that if the soil tests positive for contaminants, then the construction workers would have to be trained according to 29CFR 1910.1200 and the soil would have to be treated as hazardous waste. The City of Irvine does not currently have a contingency plan in case the soil is contaminated. LCDR Serafini stated that railroad and military property is exempt from California Environmental Quality Act (CEQA). LCDR Serafini stated that lining the channel would have the positive effect of reducing infiltration through the channel bottom and would improve the operation of the oil/water separator. M. Padian stated that the present railroad trestle is poorly supported and is a public safety issue.

The regulatory agencies expressed concern over the potential presence of contaminants in the area and wanted the area investigated prior to any construction. S. Tindall suggested that of the 22 proposed sites for the RI/FS, the study of two sites may be postponed and the funding from the two sites may be reappropriated for an RI/FS of the Agua Chinon Wash Area. Larry Nuzum/SOUTHWESTDIV stated that it would not be beneficial to move funds from one part of the investigation to another.

The general consensus was that the agencies and the Navy should wait for the initial soil sample results. The City of Irvine, the Navy, and the regulatory agencies should then meet again to discuss actions. If an expedited investigation of the Agua Chinon Wash is needed, then Navy resources will have to be reallocated. LCDR Serafini asked the City of Irvine to send a copy of their work plan for the preliminary soil sampling.

**NAVY CONTRACTING PROCEDURES**

Doris Wilson/SOUTHWESTDIV was introduced as the new contracting officer for MCAS El Toro (CTO No. 0145). She began working on this CTO on 17 September 1991. In response to J. Hamill's concern about the flexibility of the Navy's contract with the Jacobs Team, D. Wilson stated that there is lots of flexibility, but the fee must be negotiated first. The contract is flexible within the original scope of work. To add new

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samples as a contract modification, a scope must be written followed by a cost proposal.

D. Wilson distributed a table showing contract award milestones for CLEAN and Archetects and Engineering (A&E) contracts. The table demonstrated that the total best time scenario for award of CLEAN contracts ranged from 1 month for less than \$25,000 to 8 months for over \$5 million and less than \$20 million. For contracts over \$5 million, SOUTHWESTDIV doesn't have authorization for clearance of pre- or post-business clearances. The contract must go to Naval Facilities Headquarters in Washington, D.C. for approval. For contracts over \$20 million, the contract must go to the Secretary of the Navy for approval. Based upon the estimated contracting schedules, CTO No. 0145 is approximately on schedule (8 months total). Pre- and post-business clearances are required in the Navy, but not in the United States Air Force and Army.

K. Williams asked why the 8 months contracting time was not included in the FFA schedule and how the contracting times could be speeded up. S. Tindall suggested asking Jim Zack/CH2M HILL contracting specialist to give a seminar on methods to reduce time under government contracting. LCDR Serafini stated that based upon his experience with the military, changes in contracting procedures would have to be instituted from the top down. J. Hamill suggested breaking up the project into \$5 million blocks. K. Williams suggested separate CTOs for each OU. J. Hamill stated that the updated RI/FS schedule should be discussed at the public meeting.

**FFA AND RI/FS SCHEDULES**

LCDR Serafini stated that he thought the dates in the FFA schedule were negotiated in good faith and he hoped they were accepted in those terms. At the time the Navy thought the dates were reasonable. J.Hamill was very concerned that the updated Navy schedule for the RI/FS is 2-1/2 to 3 years longer than the original FFA schedule. Science Applications International Corporation (SAIC) has reviewed the proposed schedule and feels that the schedule, overall, is reasonable, but may be able to be shortened by 6 months. John Dolegowski did not agree with the statement that the schedule could be shortened.

Based upon the proposed extension to the RI/FS schedule, EPA proposed an unofficial 2-pronged approach to reduce the time before some remediation is completed at MCAS El Toro.

1. Install extraction wells at the head of the groundwater contamination plume to prevent the spread of contamination while the field investigation is going on.

This program would be separate from the Irvine Desalter. R. Herndon stated that the proposed program would have to be similar to the Irvine Desalter. A couple of additional wells could be added to extract the small areas of contaminated groundwater that may pass between the operating agricultural wells. Roy expressed that perhaps a joint program could be established to construct additional wells with the Irvine Company. R. Herndon felt that the Navy would have to go through the same procedures as OCWD has for the Irvine Desalter and the entire program would take at least 2 years. This estimate was shared by



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FFA schedule to include new dates for deliverables and to incorporate required contracting time. K. Williams stated that the existing FFA deadlines could be revised every 12 months. This would give some flexibility for the uncertainties of field work. If the Navy met the bar-chart schedule, then extensions would be automatic. Included on the bar chart schedule would be the OCWD Irvine Desalter, contracting time, the new bar chart for OUs-1, -2, -3, -4 and a request for an extension for the OU-4 Work Plan.

**CHANGES IN MONITORING WELL DESIGN**

J. Dolegowski asked for agency agreement to extend the well screen of the Phase I monitoring wells by 20 feet to accommodate the expected drop in water levels due to the cone of depression from the Irvine Desalter Project. The total drawdown at the western perimeter of MCAS El Toro after 3 years of operation of the Irvine Desalter is estimated at 50 feet. The use of 40 feet of well screen instead of 20 feet will allow the new Phase I monitoring wells to operate for a few additional years before they are dewatered.

**PLANS FOR NEXT AGENCY MEETING**

The next MCAS El Toro agency meeting was planned for 9 and 10 December 1991.

**List of Attendees**

John Dolegowski	CH2M HILL, Santa Ana	714/250-5500
Chrisa Mitchell	MCAS El Toro	714/726-6607
LCDR Serafini	MCAS El Toro	714/726-6607
Roy Herndon	OCWD	714/378-3260
Kartik Vaith	CH2M HILL, Gainesville	714/250-5500
Manny Alonzo	Cal-EPA/DTSC, Reg. IV	310/590-4904
Ken Williams	RWQCB, Santa Ana Region	714/782-4130
John Hamill	EPA, Region IX	415/744-2391
Mike Padian	Irvine Corp.	714/720-2243
K. Shawn Thompson	City of Irvine	714/724-7556
Russ Thiele	City of Irvine	714/724-7545
Sebastian Tindall	SAIC, San Francisco	415/399-0140
Andy Piszkin	SOUTHWESTDIV	619/532-1239
Ken Tomeo	CH2M HILL, Santa Ana	714/250-5500
Mike Arends	CH2M HILL, Santa Ana	714/250-5500

AGENDA

MARINE CORPS AIR STATION (MCAS) EL TORO RI/FS  
PRELIMINARY PHASE I ACTIVITIES

TECHNICAL UPDATE MEETING WITH REGULATORY AGENCIES

Wednesday, 13 November 1991 (all day)  
Thursday, 14 November 1991 (morning only)

0830

Wednesday, 13 November 1991 (Bldg #65 - Base Headquarters)

Morning

Update on progress since last meeting of 11-12 September 1991

Review of past action items (excluding topics listed below)

Community Relations

- Dry run on Friday, 15 November
- Public Forums on Monday, 18 November
  - +On-station personnel: 1300 hrs
  - +Off-station community: 1900 hrs

Use of Multiple-port (MP) Monitoring Wells

- DTSC decision

Orange County Water District (OCWD) Desalter Project

- status of draft agreement between OCWD & El Toro

Afternoon

RI/FS Schedule modifications and justifications

- Navy contracting issues
- Navy budget
- submittal of schedules showing OU-1 as stand-alone
- good cause extension/slippage

Thursday, 14 November 1991 (Bldg #368 - Facility Management)

Morning

Continue discussion of schedule issues

Afternoon (1300 hrs)

Technical Review Committee meeting (Officers Club)

**MCAS EL TORO RI/FS  
PRELIMINARY PHASE I ACTIVITIES**

**Progress from 13 Sept through 13 Nov 1991**

Prepared by John Dolegowski/CH2M HILL

**TASK A. Review Aerial Photographs, Site Surveys, and Topographic Maps**

- o Historical aerial photographs of the vicinity of MCAS El Toro prior to development were reviewed at the Fairchild Collection (Whittier College) to evaluate surface and subsurface geologic features.

**TASK D. Waste Management Plan**

- o Revision of the Waste Management Plan has begun. The completed document is planned for completion on 29 November.
- o An estimates for the coating of the waste staging area has been prepared.
- o Estimates for the numbers of waste samples and cost of analysis for waste samples were prepared.
- o Estimates for the cost of GAC treatment of waste water were prepared.

**TASK E. Preliminary Data Management Activities**

- o Diane Robey and Ken Tomeo met with Jacobs representatives to discuss standardization of data base management within the CLEAN program.

**TASK F. Subcontractor Procurement**

**A. Procurement of Drilling Services**

- o A drilling consent package was prepared for Navy approval.
- o Letters were sent to drillers extending the bid period.

**B. Procurement of Professional Services**

- o The RFP for professional services has been prepared and will be mailed to prospective bidders during the next week.

**TASK H. Subcontracting/Coordination of Analytical Services**

- o The draft consent package for the analysis of RI samples was prepared for Navy review.
- o The draft RFP for waste samples has been prepared.
- o Letters were sent to laboratories to extend their bids.

**TASK I. Field Equipment/Facilities Design**

- o The internal review bid documents for the construction of the site facilities were prepared.
- o A review meeting was held with Navy representatives on 24 October.
- o MCAS El Toro engineering staff reviewed potential tie-in point for electrical power. The electrical design may be modified to avoid overhead high voltage lines along the perimeter of the site facilities.

**TASK K. Community Relations**

- o Desktop publishing and graphics for the community relations fact sheet were completed. Navy review comments were incorporated. Printing is in progress.
- o Mailing lists were generated.

**NEGOTIATION OF MCAS EL TORO RI/FS PHASE I ACTIVITIES**

- o A fact finding meeting with the Navy was held on 24 October.
- o Face to face negotiations were held on 29 October, 31 October, and 5 November. Additional detail of the scope of work and revisions of cost proposal financial data were prepared for each meeting.

RI/FS CONTRACT ACTIVITIES & SUBMITTALS  
MCAS EL TORO

	WORKING DAYS	*-----PROGRESS-----*	
		CONTRACTUAL	SUBMITTAL
START PHASE I SCOPE/GOVT EST	0	07-May-91	
SCOPE CLARIFICATION MEETING	6	16-May-91	
RFP SENT TO CLEAN CONTRACTOR	3	20-May-91	
DATA MANAGEMENT ISSUES			24-May-91
WASTE MGT PLAN OUTLINE MTG			31-May-91
STUDY SITE FAC LOCATION			03-Jun-91
FACT SHEET - 1st DRAFT			11-Jun-91
SITE FACILITY MEETING			12-Jun-91
DATA MGT ALTERNATIVES			21-Jun-91
DRAFT WASTE MGT PLAN			28-Jun-91
CLEAN'S COST PROPOSAL	31	02-Jul-91	
SITE FAC MTG/GEOPHYSICAL RPT			09-Jul-91
DRILLERS PREBID SITE VISIT			09-Jul-91
FACT SHEET - 2nd DRAFT			16-Jul-91
MANAGERS MEETING			18-Jul-91
SITE FACILITY MAY GO MILCON!			18-Jul-91
AMEND WASTE MGT PLAN			24-Jul-91
LEASE/PURCHASE BACKUP INFO		24-Jul-91	
SITE FAC COST ALTERNATIVES			25-Jul-91
REVIEW NPDES PERMITS			26-Jul-91
NAVFAC OKs NON-MCON SITE FAC			30-Jul-91
COMMUNITY RELATIONS MEETING			05-Aug-91
DISPOSAL LEVELS (ON-SITE)			06-Aug-91
DRAFT PNP SENT TO NAVFAC		13-Aug-91	
SITE FAC STRUCTURAL CALCS			20-Aug-91
SITE FAC DESIGN REVIEW MTG			29-Aug-91
PNP SENT TO NAVFAC (+DETAILS)		30-Aug-91	
WASTE MGT: TESTING REQMTS			10-Sep-91
MANAGERS MEETING			11-Sep-91
NAVFAC REJECTS PNP PACKAGE		13-Sep-91	
FLY TO NAVFAC WITH PNP		23-Sep-91	
NAVFAC APPROVES PNP	66	02-Oct-91	
FACT SHEET - 3rd DRAFT			09-Sep-91
SITE FACILITY - FINAL REVIEW			10-Sep-91
START NEGOTIATIONS		24-Oct-91	
FINALIZE NEGOTIATIONS	30	13-Nov-91	
MANAGERS MEETING			13-Nov-91
TRC MEETING			14-Nov-91
PUBLIC MEETINGS			18-Nov-91
FLY TO NAVFAC, FINAL APPROVAL	16	05-Dec-91	
AWARD	4	11-Dec-91	
TOTAL WORKING DAYS	156		

RI/FS CONTRACT ACTIVITIES & SUBMITTALS  
 MCAS EL TORO

	WORKING DAYS	*-----PROGRESS-----*	
		CONTRACTUAL	SUBMITTAL
DRAFT RI/FS SCOPE (PLANNING)	0	22-Feb-91	
CLEAN MEETING			27-Feb-91
DRAFT WORK & SAMPLING PLANS			28-Feb-91
SCOPE/GOVT EST TO CONTRACTS	14	14-Mar-91	
RFP SENT TO CLEAN CONTRACTOR	3	18-Mar-91	
FINAL SITE MGT PLAN			22-Mar-91
EPA APPROVES WORK PLAN			29-Mar-91
CLEAN'S COST PROPOSAL	21	16-Apr-91	
PNP EVALUATION TO CONTRACTS	5	23-Apr-91	
FINAL COMM RELATIONS PLAN			26-Apr-91
START NEGOTIATIONS	6	02-May-91	
FINISH NEGOTIATIONS	3	06-May-91	

A&E/CLEAN ENVIRONMENTAL CONTRACT TIMETABLE  
CONTRACT AWARD MILESTONES

DOLLAR VALUES TASKS	AE	CLEAN	AE	CLEAN	AE	CLEAN	AE	CLEAN	AE	CLEAN	NOTES
	<25K	<25K	>25K	>25K	>500K	>500K	>1MIL	>MIL	>5MIL	>5MIL	
	-----	-----	<500K	<500K	<1MIL	<1MIL	<5MIL	<5MIL	<20MIL	<20MIL	-----
	DAY	DAY									
REVIEW/APPROVE SCOPE & G.E.	1	1	1	1	1	1	2	2	3	3	
RECEIVE PROMISE OF FUNDS	1	1	1	1	1	1	2	2	3	3	
PREPARE/APPROVE ACQUISITION PLAN	2	0	2	0	2	0	3	0	3	0	
PREPARE/APPROVE SM. BUS. SET-ASIDE	3	0	3	0	3	0	4	0	5	0	
PREPARE/APPROVE D&F FOR K TYPE	3	0	3	0	3	0	4	0	5	0	
PREPARE/APPROVE J&A FOR OPTION CL	3	0	3	0	3	0	4	0	5	0	
PREPARE/SEND SYNOPSIS/2807 CLEARANC	0	0	3	0	3	0	4	0	5	0	45 DAYS SYNOPSIS/21 DAY CLEARANCE
RECEIVE SF254/255	4	0	48	0	48	0	49	0	50	0	
SLATE BOARD/SHORT LIST	5	0	55	0	55	0	56	0	57	0	
APPROVE SLATE	6	0	56	0	56	0	77	0	78	0	>1MIL TO NAVFAC - ALLOW 3 WEEKS
INTERVIEWS/SELECTION BOARD	13	0	63	0	63	0	84	0	85	0	>200K MAY BE TELEPHONIC
APPROVE SELECTION	14	0	64	0	64	0	105	0	106	0	>1MIL TO NAVFAC - ALLOW 3 WEEKS
START RESPONSIBILITY CHECK	14	0	64	0	64	0	105	0	106	0	
REQUEST PROPOSAL	15	2	65	2	65	2	106	3	107	3	30 DAYS - LESS FOR <25K
RECEIVE PROPOSAL	30	17	95	32	95	32	136	33	137	48	
REVIEW PROPOSAL/REQUEST AUDIT	31	0	96	0	97	0	140	0	147	0	WAIVED ON CLEAN CONTRACT FOR PRESENT
RECEIVE AUDIT/COMPLETE RESP. CHECK	31	0	97	0	142	0	185	0	192	0	
PREPARE/APPROVE PRE-NEG MEMO/B.C.	32	19	103	37	147	42	195	43	214	98	
RECEIVE \$/NEGOTIATE	37	20	108	39	152	45	200	48	228	118	
PREPARE/APPROVE POST MEMO/B.C.	39	21	110	41	159	55	210	58	249	163	>5MIL TO NAVFAC/>20MIL TO ASN
RECEIVE/APPROVE SUBCONTRACT PLAN	0	0	0	0	159	55	210	58	249	163	NOT REQUIRED IF SMALL BUSINESS
OBTAIN EEO CLEARANCE	0	0	0	0	0	0	210	0	249	0	MAY BE TELEPHONIC
OBTAIN LEGAL REVIEW	0	0	0	0	0	0	215	0	259	0	
SEND CHINFO MESSAGE	0	0	0	0	0	0	216	0	260	164	3 DAY NOTIFICATION PERIOD
AWARD	40	0	110	42	163	56	219	59	263	167	
SYNOPSISIZE AWARD	0	0	0	43	164	0	220	0	264	0	WORK CAN PROCEED BEFORE SYNOPSIS
TOTAL TIME BEST SCENARIO/MONTHS	2	1	5	2	8	3	10	3	12	8	

NOTE: (1) DAYS ARE WORK DAYS

(2) DOES NOT INCLUDE PROBLEMS: O2 WORKLOAD, FOLLOW-UP AUDITS, RESUBMISSIONS OF PROPOSAL OR G.E., S/C PLAN OR REVIEW/REWRITE CYCLE

*5 days equals a week*

*All days are working*

*Prepared by SAIC  
Distributed at MCAS El Toro  
at agency meeting on 13 Nov 1992.*

REVIEW OF EL TORO MCAS  
DRAFT WASTE MANAGEMENT PLAN  
WITH RESPECT TO IDW AND APPLICABLE RCRA REGULATIONS

The Draft Waste Management Plan for the Marine Corp Air Station at El Toro, California was reviewed with respect to applicable RCRA regulations.

The El Toro Marine Corp Air Station site is assumed to be a CERCLA site. The waste generated from the proposed Remedial Investigation/Feasibility Study (RI/FS) may be termed "Investigation-Derived Waste" or IDW. This document reviews the handling of IDW as it relates to pertinent RCRA regulations.

Overall the Plan seemed to address most relevant regulatory issues. The RCRA regulations do apply; some of the waste is known to be hazardous.

For this case, some of the waste to be generated is potentially subject to land disposal restrictions (LDRs). Verification of this stems from knowledge of the composition and/or source of the waste. Often, listed wastes may be identified based solely on their source. If this is unknown or does not identify a waste as hazardous, the waste must be sampled and analyzed to determine if it is subject to LDRs based on characteristics or contamination levels above the established treatment standards.

For wastes which are hazardous only because they are listed wastes, it must be determined whether the waste is a multi-source leachate, referred to as a F039 waste. This is a new waste code established to ease the handling of different types of waste which have become mixed. If a waste is determined to be listed waste (F039 or otherwise specified), analytical data must verify that the waste meets the appropriate treatment standards before it can be disposed. If the waste does not meet the treatment standards, it is subject to treatment to attain these levels. Storage requirements apply to waste which does not meet treatment standards and awaits treatment.

Wastes which are hazardous because they exhibit one of the hazardous characteristics must also meet treatment standards before they may be disposed. Often, characteristic wastes (i.e., wastes which are restricted from land disposal only because they exhibit a characteristic) may be diluted to remove the characteristic and then disposed. There are exceptions to this, however, and some wastes must be treated to meet treatment standards. Wastes are not subject to restricted waste regulations if the applicable treatment standards are met [40 CFR 268.50(d),(e)].

For any waste potentially subject to the land disposal restrictions, even those excluded from regulation as solid or hazardous wastes under 261.2-.5, records must be kept indicating why the waste is not prohibited [55 FR 22662]. This issue did not appear to be fully addressed by the Draft Waste Management Plan.

For on-site waste management, the generator must retain copies of all notices, certifications, waste analyses or determinations, and documentation of where waste was treated, stored, or disposed for at least five years from the date waste was last managed on-site or transported off-site. The generator must also comply with storage and dilution restrictions for wastes restricted from land disposal [40 CFR 268.3, 268.7(a)(6), 268.50, and 55 FR 22662].

For off-site management, the initial generator or treatment facility must send notification and certification to EPA as described in 40 CFR 268.9(d). The waste must meet storage requirements prior to shipment for off-site treatment.

If the waste is to be stored by the generator, it must be stored on-site in tanks and containers solely for the purpose of accumulating sufficient wastes to recover, treat, or dispose. Storage requirements of 40 CFR 262.34 must be met. An interim status or permit is required for large quantity generators (>1,000 kg/mo) storing for more than 90 days. An interim status or permit is also required for small quantity generators (100-1,000 kg/mo) storing for more than 180 days (270 days if wastes must be transported over 200 miles off-site) [40 CFR 268.34, 268.50(a)(1)]. Based on the estimated quantities presented in the Draft Waste Plan, it appears as though the generator would be classified as a large quantity generator. The El Toro MCAS may already have interim status or a permit obtained during previous activities. This is not discussed in the Plan.

Section 260.10 in 40 CFR defines hazardous waste management units and containers. If IDW is placed in containers (not units) it may be returned to the area of contamination without triggering LDRs. Also sampling and direct replacement of waste (without containerization) does not constitute placement and would therefore not trigger LDRs. (See Superfund LDR Guide #5, *Determining When LDRs are Applicable to CERCLA Response Actions*, OSWER Directive #9347.3-05FS, June 1989 and the NCP, 55 FR 8759, March 8, 1990.) Storage until a final disposal option is selected in a Record of Decision (ROD) is allowable storage under the RCRA LDR storage prohibition.

Wastes stored by treatment, storage, and disposal (TSD) facilities have requirements as described in 40 CFR 268.50(a-c) with special limitations for PCB-containing wastes [40 CFR 268.50(f)]. It is important to note that PCB-containing wastes have been detected on-site at the El Toro MCAS. Also, the El Toro MCAS may be a TSD facility. This issue should be determined and addressed in the Plan.

Hopefully, this document will provide some additional insight with respect to IDW and applicable RCRA regulations along with their appropriate references. These regulations have been addressed in sufficient detail in the Draft Waste Management Plan with exceptions as noted above.

*Prepared by SAIC.  
Distributed at MCAS El Toro agency  
meeting on 13 Nov. 1992*

TECHNICAL REVIEW OF THE ORANGE COUNTY WATER DISTRICT'S  
PROPOSED DESALINIZATION PROJECT IMPACT  
ON THE EL TORO MCAS RI/FS

The following is a brief summary of questions and concerns about the referenced desalinization system that is to be installed and operated by the Orange County Water District (OCWD).

There is not much definite information available about the source(s) of the VOC contamination in the deep aquifer. Is the Base the source of the contamination or are there other potential sources in the area of the planned pumping wells? The source or sources of the contamination should be identified and quantified so it can be determined if the levels of VOCs in the ground water will increase or decrease over time.

What will be the impact of pumping on the rate of contaminate movement. The system could possibly cause a "stream lining" effect and cause contamination to move down gradient past the extraction wells, thereby spreading contamination over a wider area. This could add significantly to the long term clean up cost.

There does not seem to have been enough planning and characterization as to the impact of the pumping on the two aquifers above the C unit. Is there communication between the aquifers and will pumping of a lower aquifer draw contamination down from a unit above? There are also inadequate data on the levels of contamination in the three aquifers. Are the two upper aquifers contaminated at levels above or below the C unit? If the pumping draws contamination from overlying units will the levels entering the desalinization system exceed the capacity of the carbon unit and thereby introduce contamination to the local residents. This pathway will now have to be considered in the Baseline Risk assessment. There should be an effort made to determine if there is communication between the three aquifers and if in fact the aquifers are present beneath the Base.

*Prepared by SAIC  
Distributed at MCAS El Toro  
agency meeting on 13 Nov 1992*

REVIEW OF EL TORO MCAS DRAFT WASTE MANAGEMENT PLAN  
WITH RESPECT TO IDW AND APPLICABLE STATE REGULATIONS

The Draft Waste Management Plan (WMP) for the Marine Corp Air Station (MCAS) at El Toro, California was reviewed with respect to applicable State regulations.

The El Toro MCAS site is assumed to be a CERCLA site. Facility operations are assumed to be under RCRA interim status. The waste generated from the proposed Remedial Investigation/Feasibility Study (RI/FS) may be termed "Investigation-Derived Waste" or IDW. This document reviews the handling of IDW as it relates to pertinent State regulations.

The WMP strategy and management options appear to address and comply with most of the State requirements contained in the California Code of Regulations, Title 22 and 23. The addendum to the WMP clears up issues related to wastewater treatment and disposal. More details concerning IDW storage and treatment should be included in the final document.

In Section 3.3, On-Station Waste Accumulation and Handling, the WMP states that most of the IDW generated will be accumulated on-Station in a central waste accumulation area (WAA), as hazardous waste, until the wastes are properly classified; that a permit is not required of the WAA if the period of accumulation is 90 days or less; and that once the analytical data are available, the wastes can be segregated into nonhazardous and hazardous wastes. The California Code of Regulations (CCR) Title 22 66508(a) allows storage of hazardous waste for up to 90 days in WAAs without a permit if facility storage and operation requirements, as specified the Title 22, are met. However, the period of waste accumulation should start when the waste container is placed in the WAA, not after sample analysis is completed for final designation as hazardous or nonhazardous waste, as suggested in the WMP.

The WMP calls for on-Station disposal of nonhazardous soil cuttings and drilling mud (after reducing moisture content). According to the State Water Resources Control Board (23 CCR 2532, 2533), nonhazardous waste may be disposed on-site in

If 70 percent of the water that will be processed through the system is going to come from beneath the Base, then it is imperative that the types and quantities of contamination be identified prior to the installation and operation of the plant. The pretreatment system planned for the desalinization system has been designed to only deal with the volatile organic compounds. The pumping system could draw semivolatile organic or inorganic contaminants into the system. This again could cause the system to be shut down.

In summary, without adequate characterization of the potentially affected hydraulic units the success of the planned project is questionable. There are many possible problems that could arise because of this effort. We doubt if Orange county would allow a treatment system of this capacity to be constructed without adequate characterization of the groundwater system, potential contaminants, and the effects of pumping. Such a characterization is the objective of the RI/FS. It is, therefore, doubtful that enough information will be available to properly evaluate this proposal until the RI/FS has been completed.

a Class III facility if low levels of contaminants are present. At El Toro, the on-site disposal facility, as proposed, will not meet Class III facility standards, therefore, the Regional Water Quality Control Board (RWQCB) has determined that final contaminant disposal levels will be based on "cleanup levels" to be protective of groundwater (addendum to WMP). This approach seems reasonable and protective of environmental resources which may come into contact with waste constituents. Target compounds and cleanup levels are to be provided by the RWQCB, according to the WMP. The Toxic Pits Control Act (TPCA, Subchapter 15) normally requires a Report of Waste Discharge be submitted to the RWQCB in order to obtain Waste Discharge Requirements for waste disposal. A report may not be required in this case.

The WMP proposes to treat drilling muds, if needed, prior to disposal. 22 CCR 67425 requires that hazardous waste must contain less than 50 percent moisture by weight prior to disposal. Treatment of nonhazardous drilling muds would achieve a less than 50 percent water content, whereas free liquids would be eliminated from hazardous waste drilling mud as determined using the Paint Filter Liquids Test. Proposed on-Station treatment processes are dewatering and solidification. These would be Transportable Treatment Units (TTUs) which do not require permits if they meet the conditions of permit-by-rule as TTUs defined in 22 CCR 66392(d)(1-8). The WMP does not speak to all these conditions (which are numerous). It should address how the conditions will be complied with. Dewatering and solidification are listed as approved treatment processes for TTUs under 22 CCR 66747(a).

Nonhazardous and potentially hazardous wastewater will be generated from drilling mud dewatering, well purging, and aquifer testing. The WMP proposes to treat the nonhazardous wastewater, and possibly hazardous wastewater, for volatile organic compound removal using activated carbon filtration, another TTU process, and use it for on-Station irrigation or off-Station water reclamation (Addendum to WMP). If used for on-Station irrigation, the RWQCB will require that the discharge be free of VOCs and meet other Basin Plan objectives. A NPDES permit is not required; the operation would occur under a RWQCB Cleanup and Abatement Order. It is not clear from the WMP if this is an existing Order or has to be issued, and whether it would specify discharge limitations. There appears to be no State regulatory impediment to off-Station disposal of hazardous wastewater or soil/mud

as long as the waste meets applicable treatment requirements prior to leaving the MCAS, or is treated off-site before disposal.

Following is a discussion of other State regulations which may have some application to IDW management at El Toro MCAS, based on the WMP options.

According to 22 CCR 66310, a variance from provisions of Article 22 may be granted if the hazardous waste is handled, stored, or disposed of pursuant to regulation of another government agency (other than Department of Health Services) in a manner consistent with Article 22, and does not result in a significant potential hazard to human health and safety, livestock, or wildlife. Agreements with, and regulations specific to, the RWQCB, as is the case with this WMP, would be an example of a potential variance from the provisions of Article 22.

Permits are required for treatment of hazardous waste using TTUs (22 CCR 66371(b)(4)). However, a permit is not needed if the owner or operator complies with permit-by-rule requirements.

Under the State Interim Status facility regulations for changes during Interim Status [22 CCR 66389(b)], new hazardous wastes not included in an existing interim status document may not be treated, stored, or disposed of at a facility unless the owner or operator submits a revised Part A permit application and receives a revised interim status document from the State (DHS). This requirement may be applicable to IDW at El Toro which is hazardous waste. An interpretation of what constitutes "new hazardous waste" may be needed. Large quantities of liquid and solid waste will be generated during the investigation which will require storage and possibly treatment.

State regulations also allow categorical exemptions from land disposal restrictions. Under 22 CCR 66925(a)(3), contaminated soil from the cleanup of any hazardous waste site is exempt from land disposal restrictions, pursuant to approval by DHS, unless it is determined that a recycling or treatment process is technically and economically feasible to render the contaminated soil no longer a listed restricted hazardous waste. Depending on the nature of any

hazardous IDW, this regulation could apply if IDW is considered a component of the site cleanup.

A list of restricted hazardous wastes is contained in 22 CCR 67702. The RCRA hazardous wastes listed in this chapter are subject to land disposal restrictions. Some of these wastes may be generated at El Toro MCAS during the investigation and would be restricted wastes, unless exempted under 22 CCR 66925(a)(3).

One option presented in the WMP for dealing with IDW, which may have land disposal restrictions, is treatment (primarily for VOCs and petroleum hydrocarbons) by incineration. The WMP did not specify whether incineration might occur on- or off-Station. If it occurs on-Station, numerous regulations would have to be complied with, beginning with 22 CCR 67450. A permit would probably be required for siting, operation, and performance of the incinerator.

There are also many regulations within 22 CCR concerning land disposal of hazardous wastes at interim status or permitted facilities. These regulations set standards for design, operation, and performance of land disposal units. Only on-Station land disposal of nonhazardous waste is proposed in the WMP. If on-Station land disposal of hazardous waste is considered in the future, 22 CCR regulations would have to be complied with, in addition to land disposal restrictions under 22 CCR 67450.



SUBJECT MCAS El Toro  
13 Sept 91 Agency Mtg

BY \_\_\_\_\_ DATE \_\_\_\_\_  
 SHEET NO. \_\_\_\_\_ OF \_\_\_\_\_  
 PROJECT NO. \_\_\_\_\_

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Mike Arends	" "	" "

12 NOV 91 23:17:18

OPEN PLAN (R)  
 Report: GRAFBAR3  
 Project: RIFS RFA2  
 Time Now: 01 JUN 91  
 Date: 12 NOV 91  
 Time: 23:17:18  
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# MCAS EL TORO - RI/FS & RFA INTERFACE

CH2M HILL

ACTIVITY	01 JAN 92	01 JAN 93	01 JAN 94	01 JAN 95	01 JAN 96	01 JAN 97
2 Phased CTO/ Project						
2 RI/FS (OU 1, 2, 3) PHASE I IMPLEMENTATION						
002002 002003						
4 RI/FS (OU 4A) IMPLEMENTATION						
004001 004002 004003						
6 RI/FS (OU 4B) IMPLEMENTATION						
006001 006002 006003						
9 RFA IMPLEMENTATION						
RFA002						

Legend  
 - In progress  
 - Planned  
 - Critical

Bar Chart Key: Early Dates

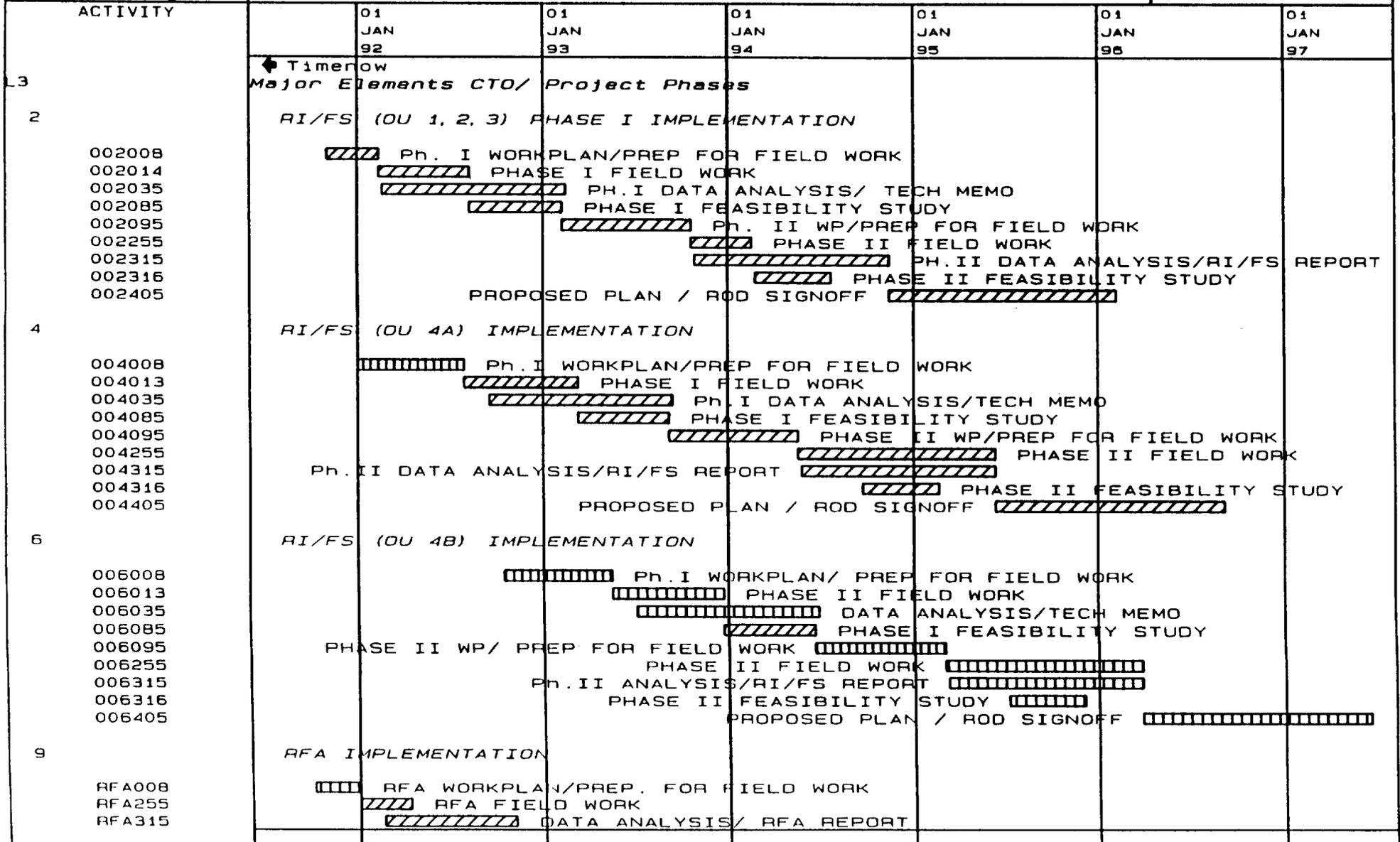
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Report: GRAFBAR3  
 Project: RIFSRFA2  
 Time Now: 01JUN91  
 Date: 12NOV91  
 Time: 23.17.18  
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# MCAS EL TORO - RI/FS & RFA INTERFACE

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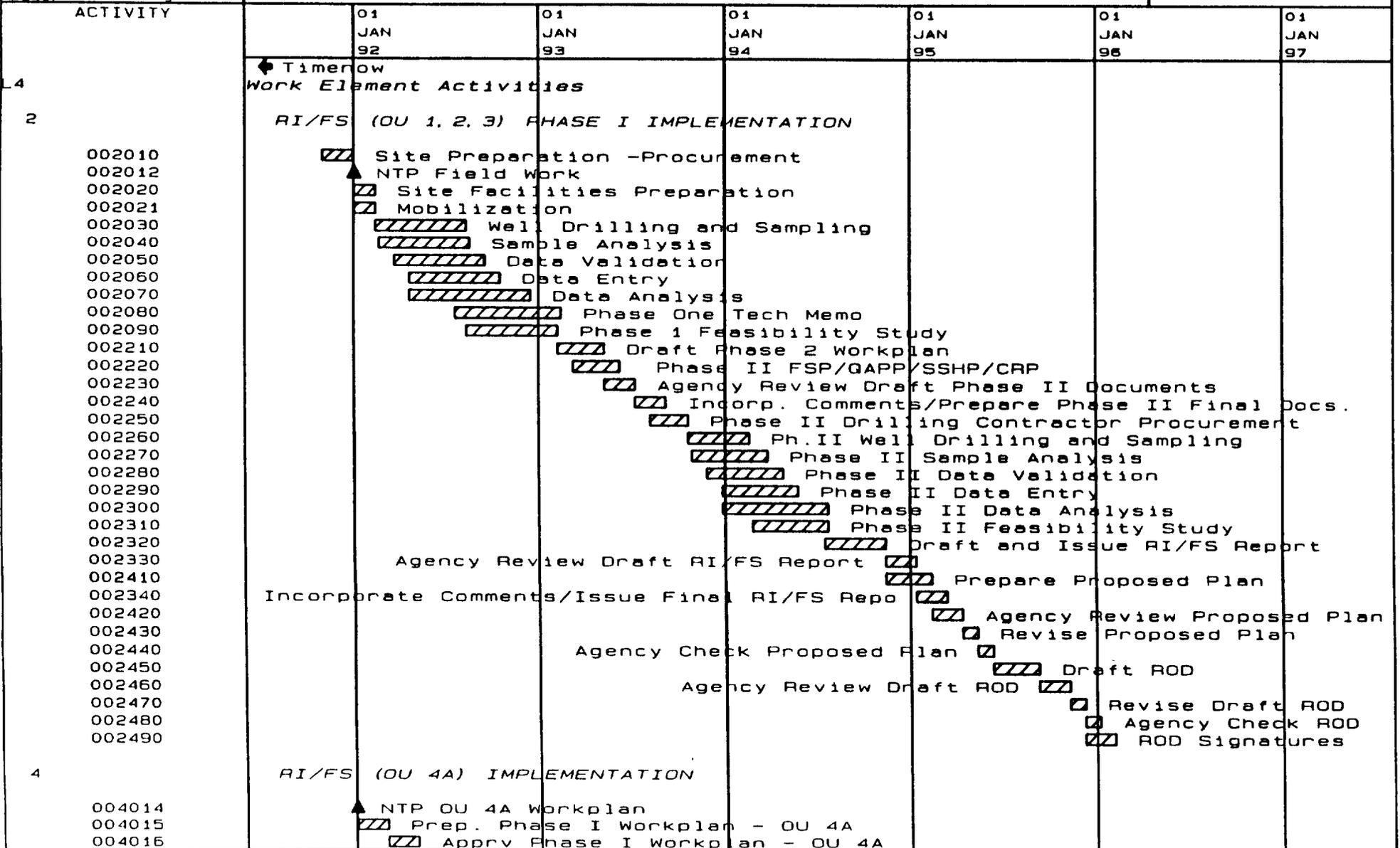
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 Project: RIFSRFA2  
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# MCAS EL TORO - RI/FS & RFA INTERFACE

CH2M HILL



Legend  
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 -Planned  
 -Critical

Bar Chart Key: Early Dates

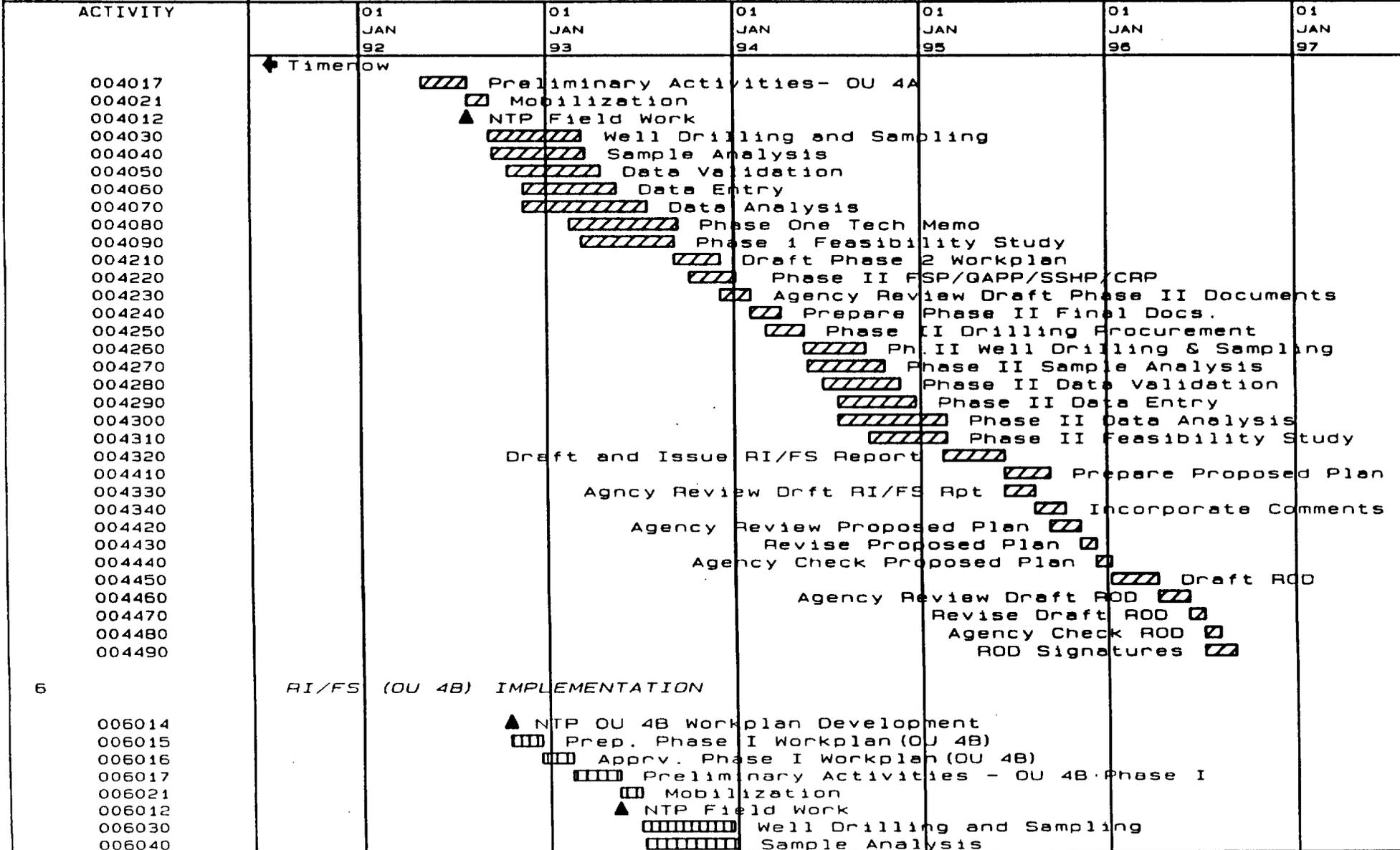
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# MCAS EL TORO - RI/FS & RFA INTERFACE

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 Project: RIFSRFA2  
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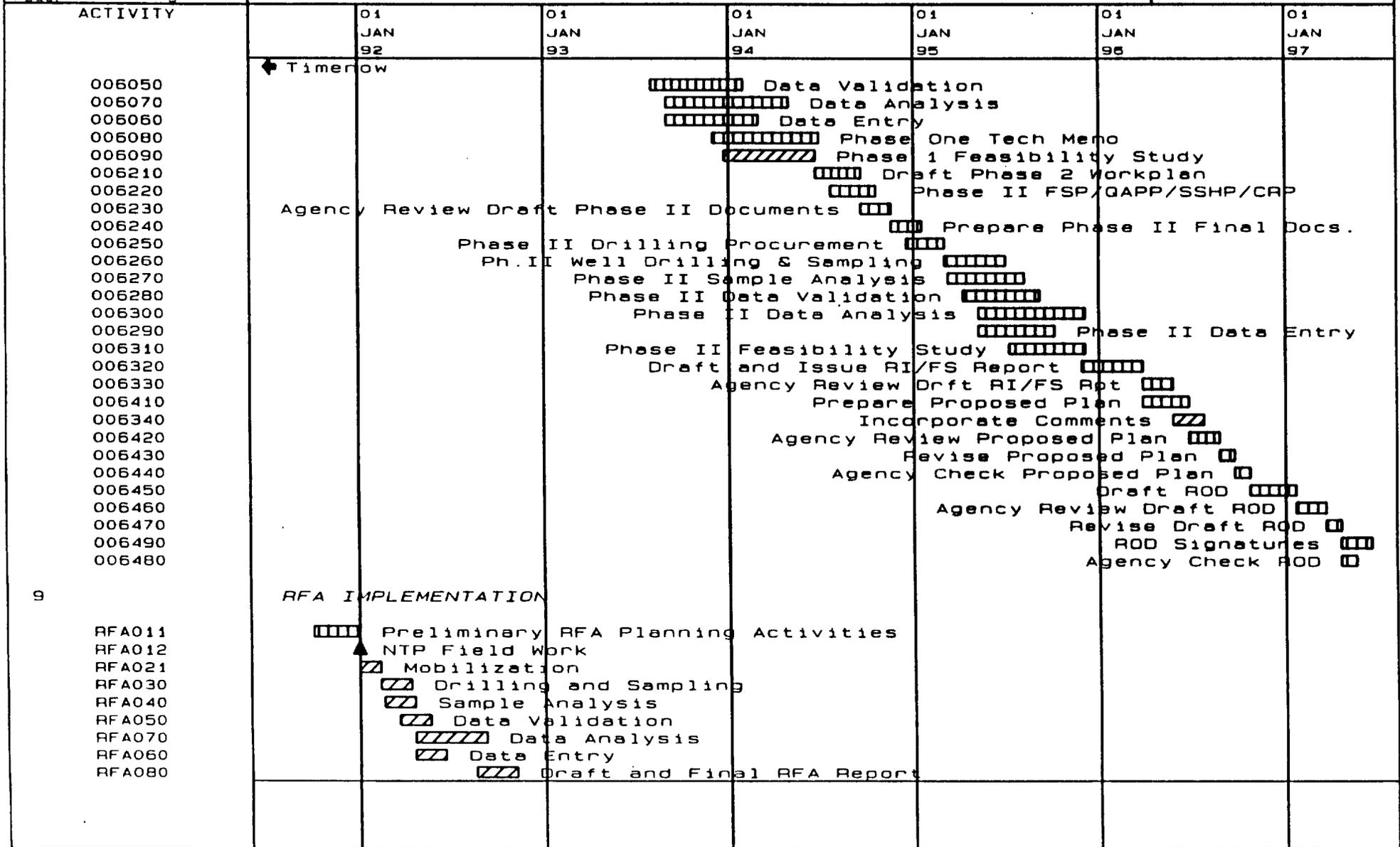
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# MCAS EL TORO - RI/FS & RFA INTERFACE

Report: GRAFBAR3  
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Bar Chart Key: Early Dates

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# MARINE CORPS AIR STATION EL TORO

