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# CLEAN TRANSMITTAL/DELIVERABLE RECEIPT

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

DATE: 19 August 1991  
CTO#: 0145  
LOCATION: MCAS El Toro  
TASK/WORK ELEMENT: \_\_\_\_\_

FROM: *John Dolegowski*  
John Dolegowski  
Project Manager

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

DESCRIPTION: Project Note: PN-0145-04; Meeting with Regulatory Agencies

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

CATEGORY:  Preliminary Draft  Preliminary Final  
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E. Rogan - CH2M HILL w/ attach File - CH2M HILL w/ attach

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	PROJECT NOTE NO. PN-0145-04 CLE-C01-01F145-I2-0007	PROJECT NO. 01-F145-H6
CONFIRMATION OF:	CONFERENCE TELECOM OTHER                    X	DATE HELD            18 July 1991 DATE ISSUED        19 August 1991 RECORDED BY        J. Dolegowski/CH2M HILL PLACE                MCAS El Toro
SUBJECT	Meeting with Regulatory Agencies Marine Corps Air Station El Toro	
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)		
(See Page 7)		
ACTION REQ'D. BY	ITEM	
	<p>Representatives of U.S. Marine Corps Air Station (MCAS) El Toro, Naval Facilities Engineering Command, Southwest Division (SOUTHWESTDIV), CH2M HILL, and the regulatory agencies (U.S. Environmental Protection Agency [EPA], California Department of Health Services (DHS), and the California Regional Water Quality Control Board, Santa Ana Region [RWQCB]), met at MCAS El Toro at 0900 hours on 18 July 1991. These meeting minutes (prepared by CH2M HILL and reviewed by the Navy) provide a summary of the major points of discussion.</p> <p>The topics of discussion of the meeting were:</p> <ul style="list-style-type: none"> <li>o Progress to-date on Preliminary Phase I activities</li> <li>o Funding for the Installation Restoration (IR) Program at MCAS El Toro</li> <li>o RCRA Facilities Assessment (RFA) Schedule</li> <li>o Lining of Agua Chinon Wash</li> <li>o Remedial Investigation (RI)-derived waste disposal options</li> <li>o RI/Feasibility Study (RI/FS) schedule</li> </ul> <p>The topic of discussion "Proposed work plan modifications to reduce disposal costs" was not completed.</p> <p><b>PROGRESS TO-DATE ON PRELIMINARY PHASE I ACTIVITIES</b></p> <p>J. Dolegowski/CH2M HILL started by discussing the progress to-date on Preliminary Phase I activities. A summary of the work completed by task is attached (Attachment A). Comments that were provided during the meeting on the various tasks are provided below.</p>	



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

John Hamill/EPA requested copies of selected aerial photographs for EPA review. Larry Nuzum agreed that Xerox copies of the photographs could be provided, but actual photographic prints were not available.

Task B - Existing Data Analysis

J. Dolegowski stated that packers in one of the multiple port (MP) system multilevel wells belonging to the Orange County Water District (OCWD) is being replaced due to packer failure from the high groundwater temperature encountered. Ken Williams/RWQCB expressed concerns over the long-term reliability of the MP wells under such conditions.

Task D - Waste Management Plan

L. Nuzum stated that the Draft Waste Management Plan would be delivered to the regulatory agencies by 26 July 1991. He asked whether there would be any problems for the regulatory agencies to meet a two-week comment period schedule with the comments due by 12 August 1991. The regulatory agency representatives agreed to the schedule.

Task E - Preliminary Data Management Activities

CH2M HILL will verify that the regulatory agencies and Science Applications International Corporation (SAIC) have received the technical memorandum on data management alternatives. Sebastian Tindall/SAIC, consultant to EPA, indicated he had comments on the technical memorandum. S. Tindall thought it would be a good idea for the "technical" people to talk on an informal basis, and would like to have a meeting among the regulatory agencies, SAIC, and CH2M HILL. He further stated the need for all four parties involved to agree on the selected data management system. Edward Rogan/CH2M HILL suggested that telephone conversations on the topic be documented and forwarded to L. Nuzum for distribution to the four parties involved. K. Williams/RWQCB suggested that CH2M HILL give demonstrations on the data management system at their Santa Ana Office, perhaps one involving the "technical" people such as the programmers, and another demonstration involving the regulatory agencies.

Task K - Community Relations

Manny Alonzo/DHS stated the need to have public meetings. L. Nuzum replied that a public meeting and an open house have been planned. LCDR Larry Serafini/MCAS El Toro expressed the Station's wish to coordinate with DHS community relations personnel, and to speak with the agency's public relations advocate. M. Alonzo and J. Hamill informed LCDR Serafini that DHS and EPA community relations contacts are Claire Best and Andy Bain, respectively. The agencies will provide comments to the draft MCAS El Toro fact sheet that was forwarded to them. M. Alonzo also indicated that the fact sheet should have tear-off coupons for interested parties to send for additional information. L. Nuzum will set a schedule for the public meeting and open house.



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**FUNDING FOR THE PHASE I RI/FS**

L. Nuzum provided an update of the funding situation. He stated the total project cost proposal with options amounted to approximately \$24 million. This amount includes the Phase I field program, feasibility study, and technical memorandum. Originally, partial funding of the Contract Task Order (CTO) was not permitted. However, the Navy was informed that incremental funding can be obtained. A total of \$7.5 million was allotted for the project. End-of-year funding can bring the total amount to \$10 to \$11 million. The balance will be funded in 1992.

L. Nuzum also stated that it appeared that the site facilities had to be funded as a military construction (MILCON) project, but it now appears that it will be funded through DERA.

M. Alonzo stated DHS needs to provide costs on projects for a yearly summary. L. Nuzum indicated that the Navy will provide the costs involved with the project to the regulatory agencies.

**RFA SCHEDULE**

E. Rogan stated that the Visual Site Inspection has been completed and will be submitted to the agencies next week. Agua Chinon Wash and Bee Canyon Wash were identified as the most significant potential sources of contamination. The Sampling Plan is a separate document and will require a few additional weeks to complete. E. Rogan indicated that the RFA is within a few days of the original schedule. However, if a large number of sites are included in Operable Unit (OU)-4, the schedule would be delayed.

**AGUA CHINON WASH**

The City of Irvine wants to line the section of Agua Chinon Wash at the southwestern border of MCAS El Toro. Chrisa Mitchell/MCAS El Toro provided the latest design drawings for lining a section of Agua Chinon Wash adjacent to the current drainage channel. LCDR Serafini stated that Agua Chinon Wash receives a large portion of the runoff from the Station. He outlined the benefits of lining the wash, planned by the City of Irvine, as achieving control of releases, and preventing infiltration of contaminants currently present in the wash.

J. Hamill expressed concerns that relocating the drainage channel may impede remediation efforts, and indicated an Environmental Impact Report (EIR) is needed. K. Williams stated the need to conduct a site investigation first, before construction can start. M. Alonzo indicated the requirements of 29 CFR 1910.120 must be taken into account. M. Alonzo also indicated the need to have the City of Irvine understand the contents of the Federal Facilities Agreement (FFA) and National Contingency Plan (NCP), and provide a briefing to the four parties involved. L. Nuzum replied that the Station does not have any objections to the need for an Environmental Impact Study (EIS). K. Williams wants to make sure that the City of Irvine uses the correct protocol.

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Based on the comments, Larry decided that MCAS El Toro will send the FFA to the City of Irvine and outside contractors. They will be briefed on the FFA National Contingency Plan, and the need to submit an EIR/EIS, taking into account NCP requirements. It is understood the Field Sampling Plan will be adhered to by all contractors conducting work on the Station.

**RI-DERIVED WASTE DISPOSAL OPTIONS**

Yueh Chuang/CH2M HILL briefly discussed the contents of the Draft Waste Management Plan, and indicated that the current list of waste management alternatives for disposal of water has been expanded since the submission of the draft document. He indicated several waste management issues require regulatory agency input. They are:

- o Disposal levels of nonhazardous soil cuttings and dewatered drilling mud for on-Station disposal at a designated area
- o Disposal levels of water for on-Station disposal to existing irrigation system
- o Physical requirements of the less-than-90-day waste accumulation area

The agencies agreed to provide guidance on the requirements for the waste accumulation area. CH2M HILL will provide proposed disposal levels for soil cuttings and water for review by the agencies.

General Comments

M. Alonzo explained that the format of California Code of Regulations (CCR) Title 22 is being changed to mirror Code of Federal Regulations (CFR) Title 40. K. Williams questioned the need to perform TCLP analysis for water samples. Y. Chuang replied that some water samples which contain solids will require such analysis. E. Rogan brought up the point that the auditing of waste disposal facilities had not been included in the budget for Phase I.

Gary Stewart/RWQCB stated that there is not a separate storm sewer system from the washes, which are permitted under the National Pollutant Discharge Elimination System. Both G. Stewart and LCDR Serafini stated water discharged to the washes can bypass the oil/water separators, and dry-weather flows are diverted to the sanitary sewer.

Disposal Levels of Nonhazardous Soil Cuttings/Dewatered Drilling Mud

Y. Chuang indicated that the disposal levels for on-Station disposal proposed in the Draft Waste Management Plan correspond with those waste acceptance criteria for Class III landfills. He also stated that all hazardous and designated wastes will be disposed off-Station to a hazardous (Class I) landfill. K. Williams stated the disposal levels for on-Station disposal will be based on "cleanup levels." He expressed his doubts that TCLP or waste extraction test (WET) soluble threshold limit concentration (STLC) threshold levels will be protective of the groundwater. Since the on-Station designated area will not be designed to meet requirements of Class III landfills, the

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disposal levels should be some factor greater than drinking water standards but less than TCLP or WET STLC threshold levels. The disposal levels should be based on attenuation of the contaminants in the soil column, and be consistent with soils which can be left in place.

Disposal Levels of Water for on-Station Disposal to Existing Irrigation System

K. Williams stated that water to be disposed of on-Station by irrigation must be free of volatile organic compounds (VOCs), and meet Basin Plan objectives for inorganics. He also stated that nitrate within the disposal water would not be a problem. In some cases water that exceeds the total dissolved solids (TDS) levels stated in the Basin Plan objectives may be used as irrigation water with prior approval from RWQCB.

Requirements of the Waste Accumulation Area

J. Dolegowski reiterated the need for regulatory input as to the exact requirements of the waste accumulation area. The three unresolved issues are: 1) The necessity of a concrete pad (versus a gravel bed); 2) The necessity for an impermeable coating as per the "drip pad" requirements; and 3) The necessity to contain a 25-year, 24-hour rainfall event. J. Hamill indicated he would get back with answers to the issues.

**RI/FS SCHEDULE**

J. Dolegowski presented a revised schedule for the RI/FS. He stated the requested schedule extension is based on a realistic estimate of the time needed to complete the RI/FS. J. Hamill indicated the meeting is merely a predecessor to a formal schedule change request.

S. Tindall expressed his views that shortening the time needed to complete the RI/FS requires increasing the frequency of informal communication between the "technical" personnel. If necessary, the discussions can be elevated to the "policy makers." He indicated that the number of review cycles can be minimized when "there are few surprises." He also urged more frequent meetings (i.e., monthly) between the "policy makers."

M. Alonzo requested monthly updates on data generated during the RI/FS. As per the FFA, the data must be submitted within 60 days after receipt. He also requested a list of the formal deliverables for the purpose of manpower allocation at DHS.

**SUMMARY OF ACTION ITEMS**

- o The Navy will provide to the agencies Xerox copies of a few selected aerial photographs that provided additional information on the RI/FS sites.
- o CH2M HILL will forward the Waste Management Plan and an addendum summarizing updated disposal alternatives to the agencies by 26 July 1991.
- o The regulatory agencies will provide review comments on the Waste Management Plan by 12 August 1991.



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- o If the regulatory agencies determine that they need additional information on data management issues, they will initiate a conference call with the Navy, CH2M HILL, DHS, RWQCB, and EPA. Notes from the conference call would be distributed to all five parties.
- o Once the data base has been set up, CH2M HILL will, if requested, provide demonstrations of the data base to technical personnel from the regulatory agencies.
- o The regulatory agencies will provide comments on the draft MCAS El Toro fact sheet by 16 August 1991.
- o CH2M HILL will include a tear-off coupon in the fact sheet so that interest readers can obtain additional information.
- o L. Nuzum will set the schedule for a public meeting and open house.
- o L. Nuzum will provide cost information on the MCAS El Toro RI/FS to the regulatory agencies.
- o MCAS El Toro will send a copy of the FFA to the City of Irvine and will brief them on the need to complete an EIR/EIS prior to lining of Agua Chinon Wash.
- o CH2M HILL will provide proposed disposal levels for soil and water to the RWQCB for review.
- o EPA and DHS will provide guidance on the requirements for the waste staging area, including: 1) The necessity of a concrete pad (versus a lined gravel bed); 2) The necessity for an impermeable coating as per the "drip pad" requirements; 3) The necessity to contain a 25-year, 24-hour rainfall event; and 4) The necessity to contain 10 percent of the total liquid volume in storage.
- o The agencies will review the revised RI/FS schedule presented for MCAS El Toro and propose what is required for formal agreement to a new schedule.
- o MCAS El Toro will invite the City of Irvine to the next meeting at MCAS El Toro.



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**LIST OF ATTENDEES:**

Manny Alonzo	DHS/TSCD Region 4
Yueh Chuang	CH2M HILL, Santa Ana
John Dolegowski	CH2M HILL, Santa Ana
John Hamill	EPA, San Francisco
Chrisa Mitchell	MCAS El Toro
Larry Nuzum	SOUTHWESTDIV
Andy Piszkin	SOUTHWESTDIV
Ed Rogan	CH2M HILL, Santa Ana
LCDR Larry Serafini	MCAS El Toro
Gary Stewart	RWQCB, Santa Ana Region
Sebastian Tindall	SAIC, San Francisco
Ken Tomeo	CH2M HILL, Santa Ana
Ken Williams	RWQCB, Santa Ana Region

cc: File - PMO, PAS  
 File - CH2M HILL  
 File - CTO Notebook/PMO, PAS

**Attachment A**

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

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

**Progress through 17 July 91**

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

- o Review of MCAS El Toro aerial photographs
- o Detailed definition of drainages at MCAS El Toro has not been possible, since photogrammetric subcontractor has not finished maps.
- o Assessment of depth of waste at landfill sites (review of site surveys, historical records, and photos)

**TASK B. Existing Data Analysis**

- o Review of SWAT reports
- o Review of Tank 398 reports
- o Review of OCWD reports; assessment of condition of OCWD monitoring wells
- o Review of NPDES monitoring data

**TASK C. Site Mapping**

- o Reproducible mylars of each site and of the entire Station are in preparation.

**TASK D. Waste Management Plan**

- o Draft Waste Management Plan has been completed.

**TASK E. Preliminary Data Management Activities**

- o Technical Memorandum on evaluation of data management alternatives

**TASK F. Subcontractor Procurement**

- o Bid specifications and RFP
- o Bid advertising
- o Pre-bid meeting

**TASK G. Easements/Permits**

- o Coordination with agencies and land owners
- o Siting of off-Station wells
- o Preparation of well permit package

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

- o Preparation of contract and RFP
- o Selection of laboratories for RI samples

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

- o List of required field, health and safety, and monitoring equipment
- o Price quotes, quote comparisons
- o Coordination with MCAS El Toro for required work areas, access to Station, and radio communications
- o Temporary facilities design - 90 percent complete

**TASK J. GEOPHYSICAL SURVEYS**

- o GPR and EM surveys at EOD Range, landfill sites, and Crash Crew Pit No. 1
- o Final report

**TASK K. COMMUNITY RELATIONS**

- o Draft fact sheet