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MCAS EL TORO
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TO: Joseph Joyce, Code 1832.JJ (1 copy)
BRAC Environmental Coordinator
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, CA. 92132-5187

DATE: 08/21/95
CTO#: 0059

FROM:
D. K. Cowser, Project Manager

DESCRIPTION: August 11, 1995 Meeting Minutes for CTO-0059, MCAS El Toro, California

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Chron No.: CTO-0059/000216

MEETING MINUTES

Meeting Subject: BCT Meeting to resolve Use of Industrial PRGs and Comments on Draft EE/CAs at MCAS El Toro	**Meeting Date:** August 11, 1995 **Meeting Time:** 10:00 a.m. **Meeting Place:** Bechtel National **Meeting Notes Prepared By:** T. Latas

Attendees: (*by telephone)

Navy	Bechtel	Other
Joseph Joyce	David Cowser	Juan Jimenez DTSC
Ginny Garelick	Tim Latas	Sherrill Beard DTSC*
Andy Piszkin	Dante Tedaldi	Larry Vitale CRWQCB
Ann Thompson	John Scholfield	Greg Holmes DTSC*
	Craig Carlisle	Bonnie Arthur USEPA
		John Christopher DTSC
		Jeff Paull USEPA
		Ronald Okuda DTSC

Additional Distribution (In Addition to Attendees):
J. Moe, J. Kluesener, and M. Potacka

Summary of Meeting Discussion Topic(s)/Action Items :

Agenda Item 1. Purpose and Introductions

Joseph Joyce conducted introductions of personnel and reviewed the agenda for the meeting. He emphasized all discussions related to the MCAS El Toro Installation Restoration Program must be conducted under the vision and mission statement which he reviewed (see attached agenda). No changes to the agenda were recommended. Mr. Joyce emphasized that the purpose of the meeting is to develop consensus and decide whether U.S. EPA industrial preliminary remediation goals (PRGs) are to be used for the 7 EE/CAs which the BCT reviewed. He stated that the position on the use of industrial PRGS rather than residential risk based concentrations (RBCs) developed from the Phase RI has been developed through a series of previous meetings, telephone conference calls, and site visits.

David Cowser stated that this meeting is not to designate reuse which is the responsibility of separate reuse committee, but rather to use the U.S. EPA guidance on using the best available information for current and potential future land use to justify the use of industrial PRGs. No BCT members disagreed with this statement.

Agenda Item 2. Review of 7 EE/CAs and Use of Industrial PRGs

Tim Latas lead the discussion of the review of the 7 EE/CAs and how these documents will change based on the application of industrial PRGs. He briefly reviewed two tables attached to the agenda (see attached). The first table summarizes which sites, units, chemicals of potential concern (COPC), volumes estimated for removal under the residential RBCs, volumes estimated for removal under the industrial PRGs, and estimated cost differences. The second table documents the calculated residential RBCs, residential PRGs, and industrial PRGs for each COPC.

On Table 1, several items were noted. First, the differences in volumes between residential RBCs and industrial PRGs do not appear to be significant. However, the volume of soil which would be segregated with metals and disposed off-site will be eliminated. Also, the volume of soil presented on Table 1 is

based on the extent of petroleum hydrocarbons (fuels) greater than 1,000 mg/kg and not necessarily the PAH, PCB, or metal concentrations. Second, the cost reduction is associated primarily with the elimination of metal contaminated soil and off-site disposal. Finally, the volumes for the Site 20, Units 2 and 3 were designated as questions because the Navy prefers to apply a recreational scenario to these units.

Larry Vitale asked the question of why was the metal contaminated soil specified for disposal off-site under the residential scenario when it could go the base landfills under the industrial scenario. In response, the Navy was applying residential scenarios to all sites previously which would prevent disposal of soil exceeding residential RBCs in the landfills.

Bonnie Arthur stated that the Baseline Risk Assessment will be conducted in late 1996 and this risk assessment will use all available data including Phase I RI data. Her understanding is that this would represent before and after conditions. John Christopher stated that because soil is non-mobile (i.e., groundwater or air) use of previous data after the removal would not be important. Jeff Paull emphasized that the best representative data of the site should be used in the baseline risk assessment. The BCT agreed that the data most representative of site conditions at the time of the baseline risk assessment should be used.

In addition to assuming an industrial scenario, the EE/CAs should reflect that the reuse plan may indicate land reuse which is different than an industrial use, and under these conditions, the site may need further evaluation to meet the preferred reuse. Andy Piszkin stated that in absence of a reuse plan the Navy has identified a reasonable, anticipated land use based on public preference for reuse as a regional airport as indicated by the Orange County Measure A ballot last fall.

Joseph Joyce asked Tim Latas to proceed with a site-by-site discussion of how industrial PRGs effect the seven EE/CA sites. The discussion is summarized as follows

- Site 13 - COPCs of lead and benzo(a)pyrene are eliminated under industrial PRGs and TRPH is used to estimated the volume of soil. Cost difference is the elimination of off-site lead disposal ($26,000). The BCT agreed to use industrial PRGs based on current and immediately surrounding land use.
- Site 14 - Benzo(a)pyrene, benzo(a)fluoranthene, and dibenzo(a,h)anthracene are COPCs under industrial PRGs. Cost difference is primarily elimination of off-site disposal ($50,000). The BCT agreed to use industrial PRGs based on current and immediately surrounding land use.
- Site 11 - PCBs remain the COPC but volume of soil for off-site disposal is reduce. The BCT agreed to use industrial PRGs based on current and immediately surrounding land use.
- Site 7 - Benzo(a)pyrene and dibenzo(a,h)anthracene are COPCs under the industrial PRGs. Cost difference is the elimination of off-site lead disposal ($19,000). The BCT agreed to use industrial PRGs based on current and immediately surrounding land use.
- Site 19 - PCBs remain the COPC but volume of soil for off-site disposal is reduce. The BCT agreed to use industrial PRGs based on current and immediately surrounding land use.
- Site 4 - TFH is the COPC using 1,000 mg/kg fuel cleanup standard (no COPCs under industrial PRGs). Cost difference is elimination of off-site lead disposal ($5,000). The BCT agreed to use industrial PRGs.
- Site 20 - Benzo(a)pyrene and lead are COPCs under the industrial PRGs. However, the Navy would like a recreational designation because of surrounding land use. For this vehicle maintenance facility, the U.S. EPA and DTSC indicated that a recreational PRG based on an industrial PRG would be acceptable. To approve this, a rational model needs to be constructed to reflect a recreational scenario similar to a industrial scenario. U.S. EPA also suggested using LEADSPREAD to develop an appropriate model for the lead. Otherwise, the BCT agreed that a recreational PRG similar to an industrial PRG will be acceptable when supported by the model.

Agenda Item No. 3. Clarification of Agency Comments on EE/CAs

John Scholfield requested clarification on four comments from the BCT on the seven Draft EE/CAs.

1. U.S. EPA Enclosure A, Comment 9 - The U.S. EPA wants to be sure the difference of a "no Further Investigation" (NFI) and a No Action ROD are clear, as discussed in previous meetings for OU-3 sites.

2. DTSC General Comment 5 - The sampling protocol for the recommended excavation will be indicated in a work plan to be prepared by the RAC. The EE/CA document is intended only to evaluated options for removals, not specifics of the removal design.

3. DTSC General Comment 11 - The decision to proceed with Removal Actions at the seven sites was made last year in light of how well the Phase I RI data characterized the site.

4. Dante Tedaldi Comment 1.2.3 - The cancer risk in the stream line risk assessment is not cumulative but based on the highest concentration.

Agenda Item No. 4 Schedule of Deliverables for EE/CAs

The deliverables for the EE/CAs was presented by Tim Latas. The current schedule indicates that the next deliverable is a "Draft Final EE/CA" for each site which will be issued for a 30-day public review and comment period. At the close of the public comment period, CLEAN II will prepare response to comments and prepare "Final EE/CAs" (if comments are significant) and "Draft Action Memorandums". These Action Memorandum and Final EE/CAs (if necessary) will be distributed for a maximum 30-day review (14 days was agreed to be more preferable). After 30-days following receipt of comments on these documents, the "Action Memorandums" and "Final EE/CAs" will be issued as finals.

The following schedule was developed after the BCT meeting on August 16, 1995 which provides realistic deliverable dates:

October 2 - Draft Final EE/CAs available for public review

October 31 - Public comments due

November 30 - Final EE/CAs and Draft Action Memorandum issued for Navy and BCT review

December 30 - Comments due from BCT and Navy

January 15-31 - Issue Action Memorandum and Final EE/CAs

Agenda Item No. 5 Delivery of Plans

Tim Latas provided an update of plan deliverables:

Final Work Plan - mailed 8/8/95

Final Field Sampling Plan - to be mailed 8/16/95

Final Risk Assessment Plan - to be mailed 8/25/95

Meeting Agenda
MCAS El Toro, California

8/11/95, 10 AM
Bechtel National, Inc.
401 West A Street
Ste. 1000, Conf. Rm A
San Diego, CA
(619) 687-8802 (D. Cowser)

Vision: Maximize restoration and reuse by 1999!!!

Mission: Fast-track remediation of MCAS El Toro to expedite reuse and protect human health and environment.

Meeting called by: Andy Piszkin

Attendees:

Bonnie Arthur, EPA	Juan Jimenez, Cal EPA	John Scholfield, B&C
Craig Carlisle, Bechtel	Joseph Joyce, El Toro	Dante Tedaldi, Bechtel
Dave Cowser, Bechtel	Tim Latas, Kleinfelder	Larry Vitale, RWQCB
Ginny Garelick, SWDIV	Vish Parpiani, El Toro	

Purpose: **UPDATE ON MCAS EL TORO**

Agenda

1. Purpose and Introductions	J. Joyce & D. Cowser
2. Review the seven (7) EE/CA sites and confirm use of industrial PRGs.	T. Latas
3. Clarification of Agency comments on EE/CAs.	J. Scholfield
4. Schedule of deliverables for Removal Actions (EECAs and Action Memos)	T. Latas
5. Delivery of Plans	T. Latas

Notes

"DRAFT - FOR DISCUSSION PURPOSES ONLY"

Table 1
Comparison of Residential RBCs Verses Industrial PRGs

Site/Unit	Chemicals of Potential Concern	Volume calculated using Residential RBCs (in cubic yards)	Volume estimated using Industrial PRGs (in cubic yards)	Estimated Cost Savings using Industrial PRGs[a]
Site 4/Unit 2	TFH-d, PAHs[b], Lead[b], Dieldrin[b]	105	105	$5,000[c]
Site 7/Unit 1	TRPH, PAHs, Lead[b]	930	930	$19,000[c]
Site 11/Units 1 & 2	PCBs	100	81	$7,000[d]
Site 13	TRPH, PAHs[b], Lead[b]	1,050	975	$26,000[e]
Site 14	TRPH, PAHs, Lead[b]	290	290	$50,000[c]
Site 19/Unit 2	PCBs	420	420	$0[f]
Site 20/Units 2 & 3[g]	TRPH, PAHs, Lead	60	?	?

Notes:
- [a] Rough estimate based on average treatment/disposal unit prices. A detailed cost analysis has not been performed.
- [b] Concentrations of this chemical/s on site are below Industrial PRGs
- [c] Costs reduced because industrial PRGs do not require lead contamination in soil to be treated
- [d] Use of industrial PRGs reduces the estimated total volume of PCB contaminated soil and associated cost
- [e] Use of industrial PRGs eliminates need for treatment of lead contaminated soil, thereby reducing the estimated total volume of contaminated soil and associated cost
- [f] Estimate does not change. The distribution of PCB concentrations within excavation at the site are unknown
- [g] Site proposed to be addressed under a recreational land use scenario (See Issue 4)

Issues:

1) Changing to an industrial land use scenario at the EE/CA sites does not greatly affect volume of soil to be excavated and treated.

2) The limited data for the seven EE/CA sites do not provide enough information for a precise identification of volumes of soil to be excavated when comparing Residential RBCs vs Industrial PRGs, however, rough estimates indicate volume reductions may be realized at Sites 11 and 13 by using an industrial land use scenario and associated industrial PRGs for PCBs and lead, respectively. This would reduce costs at these two sites.

3) Lead concentrations (from Phase I data) at Sites 4, 7, 13, and 14 are below industrial PRG levels. Therefore, soil would not require treatment for lead.

4) Presently there are no recreational PRGs, it is assumed that recreational PRGs would closely resemble either the residential or industrial PRGs depending on the exposure scenario (i.e. once a day vs once a week).

Summary of Risk based on Highest Concentrations of Chemicals Exceeding Specified Thresholds

Site 4 - Ferrocene Spill Area, Unit 2

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
Benzo(a)pyrene	ca	0.22	0.042	5.24	5.24E-06	0.061	3.61	3.61E-06	0.26	0.85	8.46E-07
Dieldren	ca	0.033	0.019	1.74	1.74E-06	0.028	1.18	1.18E-06	0.12	0.28	2.75E-07
Lead	nc	258	130	1.98	1.98	130	1.98	1.98	1000	0.26	0.26

Note: The compound primarily determining the volume of soil to be excavated at this unit is TFH-diesel (concentrations exceeding 1,000 mg/kg).

Site 7 - Drop Tank Drainage Area No. 2, Unit 1

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
Benzo(a)anthracene	ca	1.1	0.42	2.62	2.62E-06	0.61	1.80	1.80E-06	2.6	0.42	4.23E-07
Benzo(a)pyrene	ca	1.3	0.042	30.95	3.10E-05	0.061	21.31	2.13E-05	0.26	5.00	5.00E-06
Benzo(b)fluoranthene	ca	2.4	0.42	5.71	5.71E-06	0.61	3.93	3.93E-06	2.6	0.92	9.23E-07
Dibenzo(a,h)anthracene	ca	0.28	0.042	6.67	6.67E-06	0.061	4.59	4.59E-06	0.26	1.08	1.08E-06
Indeno(1,2,3-c,d)pyrene	ca	0.8	0.42	1.90	1.90E-06	0.61	1.31	1.31E-06	2.6	0.31	3.08E-07
Lead	nc	139	130	1.07	1.07	130	1.07	1.07	1000	0.14	0.14

Note: The compound primarily determining the volume of soil to be excavated at this unit is TRPH (concentrations exceeding 1,000 mg/kg).

Site 11 - Transformer Storage Area, Units 1 and 2

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
PCBs	ca	4.96	0.04	124.00	1.24E-04	0.066	75.15	7.52E-05	0.34	14.59	1.46E-05

[a]Chemicals listed are those that exceed the RBCs for the specified site or units within that site.

[b]Risk Based Concentration

[c]Preliminary Remediation Goal

[d]Numerical value corresponding to an estimated risk of 1×10^{-6} for carcinogens and a hazard index of 1 for non-carcinogens.

Summary of Risk based on Highest Concentrations of Chemicals Exceeding Specified Thresholds

Site 13 - Oil Change Area, Units 1 and 2

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
Benzo(a)pyrene	ca	0.21	0.042	5.00	5.00E-06	0.061	3.44	3.44E-06	0.26	0.81	8.08E-07
Lead	nc	250	130	1.92	1.92	130	1.92	1.92	1000	0.25	0.25

Note: The compound primarily determining the volume of soil to be excavated at these units is TRPH (concentrations exceeding 1,000 mg/kg).

Site 14 - Battery Acid Disposal Area

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
Benzo(a)anthracene	ca	2.2	0.42	5.24	5.24E-06	0.61	3.61	3.61E-06	2.6	0.85	8.46E-07
Benzo(a)pyrene	ca	3.1	0.042	73.81	7.38E-05	0.061	50.82	5.08E-05	0.26	11.92	1.19E-05
Benzo(b)fluoranthene	ca	3.8	0.42	9.05	9.05E-06	0.61	6.23	6.23E-06	2.6	1.46	1.46E-06
Dibenzo(a,h)anthracene	ca	0.64	0.042	15.24	1.52E-05	0.061	10.49	1.05E-05	0.26	2.46	2.46E-06
Indeno(1,2,3-c,d)pyrene	ca	1.5	0.42	3.57	3.57E-06	0.61	2.46	2.46E-06	2.6	0.58	5.77E-07
Lead	nc	923	130	7.10	7.10	130	7.10	7.10	1000	0.92	0.92

Site 19 - Aircraft Expeditionary Refueling (ACER) Site, Unit 2

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
PCBs	ca	20	0.04	500.00	5.00E-04	0.066	303.03	3.03E-04	0.34	58.82	5.88E-05

[a]Chemicals listed are those that exceed the RBCs for the specified site or units within that site.

[b]Risk Based Concentration

[c]Preliminary Remediation Goal

[d]Numerical value corresponding to an estimated risk of 1×10^{-6} for carcinogens and a hazard index of 1 for non-carcinogens.

Summary of Risk based on Highest Concentrations of Chemicals Exceeding Specified Thresholds

Site 20 - Hobby Shop, Units 2 and 3

Chemical Name[a]	Class (ca - cancer, nc - non-cancer)	Highest Concentration (mg/kg)	Residential RBC[b]			Residential PRG[c]			Industrial PRG		
			RBC[d] (mg/kg)	Concentration to RBC Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value	PRG[d] (mg/kg)	Concentration to PRG Ratio	Risk or Hazard Index Value
Benzo(a)pyrene	ca	0.79	0.042	18.81	1.88E-05	0.061	12.95	1.30E-05	0.26	3.04	3.04E-06
Lead	nc	2870	130	22.08	22.08	130	22.08	22.08	1000	2.87	2.87

Note: The compound primarily determining the volume of soil to be excavated at these units is TRPH (concentrations exceeding 1,000 mg/kg).

[a]Chemicals listed are those that exceed the RBCs for the specified site or units within that site.

[b]Risk Based Concentration

[c]Preliminary Remediation Goal

[d]Numerical value corresponding to an estimated risk of 1×10^{-6} for carcinogens and a hazard index of 1 for non-carcinogens.

SCHEDULE FOR
REMOVAL ACTION DOCUMENTS
MCAS EL TORO, CTO-0059

ITEM	DURATION	START	FINISH
EE/CAs			
Issue Draft EE/CAs			25 May
Receive Navy comments			31 July*
Prepare response to comments	30 days		
Issue Draft Final EE/CAs			
Public comment period	30 days		
Address public comments	30 days		
Issue Final EE/CAs			
ACTION MEMOS			
Prepare and issue draft Action Memos			
Navy comment period	30 days		
Prepare response to comments	30 days		
Issue final Action Memos			

* Waiting for "final" comments and resolution of clean-up levels.