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TO: Jason Ashman, RPM (3 copies)
Code 1831.JA
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, CA. 92132-5187

DATE: July 19, 1995
CTO#: 0059

FROM:
for J. W. Kluesener, Operations Manager

D. K. Cowser, Project Manager

DESCRIPTION: Response to Comments on Investigation-Derived Waste Management Plan
Phase II RI/FS, MCAS El Toro, California
CTO-059

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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 0212

IN REPLY REFERENCE: CTO-0059/000185

July 19, 1995

Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92131-5187

Attention: Jason Ashman, RPM
Code 1831.JA

Subject: Response to Comments on Investigation-Derived Waste Management Plan
Phase II RI/FS, MCAS El Toro, California
CTO-0059

Dear Mr. Ashman:

Attached are three (3) copies of the Response to Comments for the Investigation-Derived Waste Management Plan (IDWMP), Phase II RI/FS, MCAS El Toro, California, prepared for CTO-0059 under Contract No. N68711-92-D-4670.

We have submitted copies of this Response to Comments to all individuals receiving the Final IDWMP.

If you have any questions, please contact Timothy Latas at (619) 687-8848, or me at (619) 687-8802.

Very truly yours,

David Cowser
Project Manager

DC/cg

Enclosure: Response to Comments for Investigation-Derived Waste Management Plan for CTO-0059



Bechtel National, Inc. *Systems Engineers—Constructors*

**RESPONSE TO INVESTIGATION-DERIVED WASTE MANAGEMENT PLAN (IDWMP)
 PHASE II REMEDIAL INVESTIGATION AND FEASIBILITY STUDY
 MCAS El Toro, California**

<p>Originator: Vish Parpiani, Commanding General MCAS El Toro</p> <p>To: Timothy W. Latas CLEAN II Team</p> <p>Date: 28 February 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p><u>GENERAL COMMENTS</u></p> <p>1. The following comments are submitted on the draft IDWMP:</p> <p>a) Section 1.5 - Project Organization, Figure 1-2 - The project organization is limited to upper management level only. Additional working level management will be informative. Where is Mr. Dante Tedaldi's position?</p> <p>b) Section 3.3 - Petroleum Hydrocarbon-Contaminated Soil - Figure 3-2 - It appears that a bioremediation facility is likely to be on the base. What type of bioremediation facility is likely to be on the base.</p> <p>6.3 <u>Waste Disposal</u>. Add: "A Uniform Hazardous Waste Manifest shall be prepared for every hazardous waste shipment going off-station to an authorized disposal facility. Manifest shall be signed by an authorized representative of the Station Environmental Department (Block 16 of attached example).</p>	<p><u>GENERAL RESPONSES</u></p> <p>RESPONSE a): The organization chart has been replaced with a chart developed for the Phase II RI/FS work plan. Many personnel shown on this chart will be assigned in the next few months. Mr. Tedaldi provides technical review and support for the U.S. EPA.</p> <p>RESPONSE b): A portable thermal desorption system will most likely be used on-site at MCAS El Toro and may be operated by the Remedial Action Contractor (RAC) OHM Remedial Services, Inc. Figure 3-2 has been revised.</p> <p>RESPONSE 6.3: Incorporated statement and included sample manifest as a figure.</p>

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<p>Originator: T. H. Christensen, Assistant Chief of Staff, Installation United States Marine Corps</p> <p>To: Vish Parpiani, Environmental Engineer MCAS El Toro</p> <p>Date: 28 February 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>Paragraph 1.2 and Figure 1-1. Paragraph 1.2 references the site to the cities of Santa Ana and Laguna (Beach) and refers the reader to Figure 1-1 that does not show either of those two cities. Recommend they be shown on figure 1-1 to orient the reader that is unfamiliar with the area.</p>	<p>RESPONSE: Cities are shown on Figure 1-1.</p>
<p>Figure 3-2. Why is the only treatment option the bioremediation facility? In paragraph 6.3.4 the Tustin thermal desorption units is named as a possibility. For this figure shouldn't we leave it open to any approved treatment system that can deliver output under 100 mg/kg?</p>	<p>RESPONSE: Figure 3-2 revised and paragraph 6.3.4 revised to state treatment with an approved system capability of meeting the 100 mg/kg treatment goal. These treatment systems may be located on-site or off-site.</p>
<p>Paragraph 6.1 and Figure 6-1. The paragraph discusses the WSF but this feature is not highlighted on Figure 6-1.</p>	<p>RESPONSE: The WSF will be designated on Figure 6-1.</p>
<p>Paragraph 6.2.1, last sub-paragraph. MWR has been a reluctant user of reclaimed water. They will have to approve this use. If there is an algae bloom that affects their greens they will stop using reclaimed water at all which would require another alternative to discharge the output of the GAC system, perhaps to the sanitary sewer?</p>	<p>RESPONSE: The Remedial Action Contractor (RAC) (OHM, Inc.) will operate the GAC system and be responsible for meeting discharge requirements and coordinate reuse of the reclaimed wastewater.</p>
<p>Paragraph 6.3.2. What "base treatment facility?" Is this referring to the GAC system? If so call it that. If not the GAC system there is no wastewater treatment system on the station to my knowledge.</p>	<p>RESPONSE: Changed to read GAC system.</p>
<p>Figure 6-3. Neither petroleum hydrocarbon contaminated soil (Section 6.3.4) or radioactive mixed waste (Section 6.3.6) are in this figure. If they are important enough to warrant sections in the text they should show on the flow diagram or there should be a note as to why and how they are excluded and that their classification and disposal is handled differently.</p>	<p>RESPONSE: Petroleum hydrocarbon contaminated soil and radioactive and mixed waste include on Figure 6-5.</p>

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<p>Originator: Timothy J. Evans, Counsel MCAS El Toro</p> <p>To: Vish Parpiani MCAS El Toro</p> <p>Date: 6 March 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>Section 3.2 California Hazardous Waste Criteria should include cites to the California Code of Regulations (CCR) Title 22. Since we are required to follow the analysis plan, the analysis section should reference specific regulations in Title 22 CCR. I would have included them in my review, however, as you may be aware, no one on this station has a current copy. Not to worry, Counsel's office has them on order and should receive them within the next month.</p>	<p>RESPONSE: Reference to Section to 22 CCR Sec. 66261.1 et. seq. included.</p>
<p>Section 3.3 Petroleum Hydrocarbon-Contaminated Soil should include specific references to Title 23 Water Resources Board regulations and other applicable policy documents. The Regional Water Quality Control Board as well as the Orange County Environmental Health Division have some policy documents on this issue and Bechtel should try and get a copy of them to include in an Appendix to the DWMP. The plan should be as complete as possible to evidence the fact that the Station is doing its best to comply with federal, state, and local regulations.</p>	<p>RESPONSE: Title 23 and Regional Water Quality Control Board documents discuss cleanup of petroleum hydrocarbon contaminated soil. Off-site disposal will be based on permit restrictions of available disposal or treatment facilities.</p> <p>On-site treatment goals will require a TPH of 100 mg/kg. Disposition of the on-site treated soil will depend on site actions, but may include using treated soil for site backfill or as grading material at either Site 2, 5, or 17.</p>
<p>Rewrite Paragraph 2, sentence 3 of Section 3.3 Petroleum Hydrocarbon-Contaminated Soil to read "less than 1,000 milligrams per kilogram" vice "up to 1,000 milligrams per kilogram." This adds a little margin of safety.</p>	<p>RESPONSE: Comment incorporated.</p>
<p>Rewrite sentence 3 of Section 5.3 Petroleum Hydrocarbon-Contaminated Soil to read "as described in Section 3.3" vice "as described in Section 3.3.1." There is no Section 3.3.1.</p>	<p>RESPONSE: Comment incorporated.</p>
<p>Rewrite Sentence 1 of Section 6.3.4 Petroleum Hydrocarbon-Contaminated Soil to read "as described in Section 3.3" vice "as described in Section 3.3.1." There is no Section 3.3.1.</p>	<p>RESPONSE: Comment incorporated.</p>

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<p>Originator: Edward J. Rumsey, Director, Engineering Division MCAS El Toro</p> <p>To: AC/S Environment and Safety (IAU)</p> <p>Date: 3 February 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>Figure 3-2. Why don't we add a decision box that allows for the use of the Site 13 Thermal Desorption Unit while it is on-site. THP containing soils that are encountered during its presence or prior could be treated versus disposal at a landfill. Verify that longer contact times in the unit will allow for remediation to the 100 threshold versus the 1000 goal at Site 13.</p>	<p>RESPONSE: Figure 3-2 revised to read a decision for "an approved treatment system available (either on-site or off-site)". This allows flexibility to whether the wastes go to bioremediation thermal desorption, or similar system located on off-site.</p>
<p>Paragraph 6.2.1. Before disposal of water in the golf course water tank, MWR needs to be consulted. Specific concerns that they have voiced in the past is quantity and quality.</p>	<p>RESPONSE: The Remedial Action Contractor (RAC) is responsible for operation maintenance, and meeting discharge requirements. The RAC will also coordinate reuse of the reclaimed wastewater.</p>
<p>Paragraph 6.3.4. This doesn't match the rest of the text. Neither the text or the decision flow chart. (Figure 3-2) support this disposal method.</p>	<p>RESPONSE: Figure 3-2 and Section 6.3.4 revised to reflect "an approved treatment system" capable of meeting the treatment goal of 100 mg/kg. This allows flexibility at the time of IDW generation for appropriate treatment.</p>

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<p>Originator: Bonnie Arthur, Remedial Project Manager United States Environmental Protection Agency</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 28 March 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>1) Page 5-2, Section 5.4; The text indicates that gross radioactivity levels will be compared to ambient 100 ct/min. Please provide these ambient levels and indicate when the regulatory agencies reviewed/approved these levels.</p>	<p>RESPONSE 1): Radiological screening of soil samples is included in Bechtel National SOP 20 (which have been distributed to regulatory agencies). The establishment of background is documented in this SOP. The text has been changed to incorporate reference.</p>
<p>2) Page 6-7, Section 6.3; In most cases, EPA recommends that storage of hazardous waste not exceed 90 days.</p>	<p>RESPONSE 2): The IDW will not be classified until analytical results from the investigation or specific waste classification analyses are completed. However, the IDW will be handled and stored as hazardous waste until the analytical results are available. The start of the 90 day storage period will begin the day of generation of the IDW. All Waste classification must be completed in less than 90 day period, so appropriate disposal can occur for hazardous waste.</p>
<p>3) Page 6-9, Section 6.3.4; Please update whether the MCAS Tustin thermal desorption unit will be utilized for treatment of petroleum hydrocarbon-contaminated soil.</p>	<p>RESPONSE 3): Due to the uncertainty of availability of the MCAS Tustin thermal desorption unit, this section and Figure 3-2 have been revised to reflect that "an appropriate treatment system" will be used and may be located either on- or off-site. This system (whether bioremediation, thermal desorption, or other system) must be capable of meeting the 100 mg/kg treatment goal for petroleum hydrocarbon contamination.</p>

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<p>Originator: Lawrence Vitale California Regional Water Quality Control Board - Santa Ana Region</p> <p>To: Juan Jimenez Department of Toxic Substance Control</p> <p>Date: 8 February 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>Section 3. REGULATORY CRITERIA</p> <p>Page 3-3, Petroleum Hydrocarbon-Contaminated Soil. The first sentence of the second paragraph, regarding no specific guidelines or requirements concerning soil contaminated with petroleum hydrocarbons (TPH), should be deleted. There are guidelines and requirements regarding TPH soil contamination based on site specific conditions. These requirements are based on, contaminant nature, depth to groundwater or distance to surface water, lithology, stratigraphy, surface features and other groundwater characteristics. Some of the guidance and regulatory documents include: Leaking Underground Fuel Tank Guidelines, Title 23 California Code of Regulations, Chapter 16, Underground Storage Tank Regulations, and the Designated Level Methodology, for waste classification and cleanup level determination.</p>	<p>RESPONSE: Concur with deletion of first sentence. The LUFT and Title 23 CCR are useful for establishing cleanup and will be used as a guidance for petroleum hydrocarbon contamination cleanup. The Designated Level Methodology will be consulted for hazardous waste threshold limit concentrations for waste characterization and designated levels for site cleanup to protect groundwater and surface waters. The references have been included.</p>
<p>Page 3-4, Figure 3-2. Another choice for petroleum hydrocarbon (TPH) contaminated soil disposal, for soils with TPH concentration above 100 mg/kg, could be disposal at one of the Base landfills, if sufficient water quality protection is provided.</p>	<p>RESPONSE: Disposal of soils with TPH concentrations of less than 100 mg/kg may occur at the station landfills. The RWQCB will be consulted if disposal of soils with greater than 100 mg/kg of TPH is recommended at the station landfills.</p>
<p>Page 5-2, 5.2 Designated and Nonhazardous Waste. It may be inaccurate to label drums as Designated waste. Title 23 California Code of Regulations, Chapter 16, Section 2522 Designated Waste, defines a Designated waste as, "nonhazardous waste which consists of or contains pollutants which under ambient environmental conditions in the waste management unit could be released at concentrations in excess of applicable water quality objectives, or which could cause degradation of waters of the state". Therefore, in order to classify a waste as Designated you must know where the waste will be disposed and what the water quality objectives for the disposal location are. It would be more appropriate to label the waste drums as either hazardous waste or nonhazardous and determine if the waste is Designated when the disposal location has been determined.</p>	<p>RESPONSE: Concur. The drums will be labeled as "Investigation-Derived Waste". Once analytical results are available, the IDW will be classified and appropriate disposal taken. However, from the date of collection to classification, the drummed IDW will be stored and handled as hazardous.</p>

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<p>Originator: Lawrence Vitale California Regional Water Quality Control Board - Santa Ana Region</p> <p>To: Juan Jimenez Department of Toxic Substance Control</p> <p>Date: 8 February 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p><u>GENERAL COMMENTS</u></p> <p>2. The Department is concerned over the potential conflict associated with the storage of IDW for an unspecified time period so that it can be addressed with the final remedy and 90 day storage requirement which all generators have to deal with. The Navy/Marines have to comply with laws and regulations which are substantive and may follow guidance as appropriate. (See CCR, Title 22, Division 4.5, Chapter 10 et. al., as applicable.)</p>	<p><u>GENERAL RESPONSES</u></p> <p>RESPONSE 2: Once analytical results are available, the IDW will be classified for final disposal. If the IDW is classified as hazardous, then it will be stored for less than 90 days, following generation of the waste. The IDW may be addressed with the final remedy if classified as non hazardous.</p>

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<p>Originator: William Lee Environmental Department, MCAS El Toro</p> <p>To: Joseph Joyce MCAS El Toro</p> <p>Date: Unknown</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p><u>SPECIFIC COMMENTS</u></p>	<p><u>SPECIFIC RESPONSES</u></p>
<p>1. Page 1-2, Figure 1-1. The figures as provided, do not have scales. Please provide.</p>	<p>RESPONSE 1: Scales added.</p>
<p>2. Page 3-3, Paragraph 3. See Mr. Vitale's first comments.</p>	<p>RESPONSE 2: See responses above.</p>
<p>Section 4. WASTE CHARACTERIZATION</p>	
<p>3. Page 4-1. The second bullet item on this page refers to "Decontamination water from cleaning drilling equipment." However, the associated text addresses the results of analysis for soil samples collected from boreholes/wells... Since waste soil samples are addressed in the first bullet item, I presume you mean water samples. Please correct.</p>	<p>RESPONSE 3: Corrected to read "results of analyses of wastewater samples".</p>
<p>4. Page 4-1. The third bullet item refers to both "Waste sediments/decontamination water from vibracore activities. Please revise the text so that it clearly demonstrates that this bullet item addresses waste characterization for both sediments and decontamination water.</p>	<p>RESPONSE 4: This bullet deleted because no vibracore activities are planned. The second bullet is revised to read "Decontamination water from cleaning, drilling and sampling equipment" to account for waste water derived from sampling equipment decontamination.</p>
<p>5. Page 4-1. The last paragraph mentions that "Representative samples may also be collected from the waste liquids generated during decontamination of soil gas probes and ..." The text should be expanded to state the criteria which will be used and the decision maker identified, in advance, as to when these "Representative samples" should be taken and who will make the call. I presume that the call be done in the field and documented in some form or another. Lets discuss the details.</p>	<p>RESPONSE 5: Paragraph revised to indicate wastewater samples will be collected for to represent 500 gallons of wastewater or as needed to satisfy discharge requirements.</p>
<p>Section 5: WASTE CLASSIFICATION</p>	
<p>6. Page 5-1. The first paragraph in Section 5.1, lines 2-4 contradicts the first sentence of paragraph 1. Either all the federal, state and base regulations for classifications of waste will be applicable, i.e., IDW will be defined as hazardous under the criteria of ignitability, corrosivity, or reactivity period, if they are applicable or they will not be. If the criteria applies in general it also applies to soil cuttings and well development water. The criteria applies. Please revise lines 2-4 of paragraph 1 in Section 5.1 to state this.</p>	<p>RESPONSE 6: Sentence revised to state IDW "usually does not meet the criteria of ignitability, corrosivity, or reactivity unless material other than soil cuttings and well development is encountered (e.g., phase-separated petroleum product). If toxicity criteria are exceeded (Figure 3-1), the material will be classified as hazardous. If analytical results indicate that ignitability, corrosivity, or reactivity are of concern, these analyses will be conducted.</p>

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<p>Originator: William Lee Environmental Department, MCAS El Toro</p> <p>To: Joseph Joyce MCAS El Toro</p> <p>Date: Unknown</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>7. Page 5-2. Paragraph is entitled "Designated and Nonhazardous Waste". It may be inappropriate to classify and label wastes as designated. It may be classified as a special waste, if applicable, per CCR, Title 22, Division 4.5, Article 4.5 by following the requirements in Article 5, Section 66261. et. al. Lets discuss. See Mr. Vitale's comment as well.</p>	<p>RESPONSE 7: The IDW will be labeled as "Investigation-Derived Waste" until appropriate classification can be determined from analytical results which will be conducted in less than 90 days from the date of generation so the IDW are stored for less than 90 days.</p>
<p>Section 6. WASTE HANDLING AND DISPOSAL</p> <p>8. Page 6-1. It is the Departments understanding that all non hazardous wastes are being addressed in less than 90 days. The first paragraph states that "The wastes transferred to the facility are to be stored until final treatment and disposal alternatives for soils remediation have been evaluated." There is clearly a disconnect here. The hazardous or as it is referred to in the text "designated" wastes which are being stored in the south half of the facility have exceeded their 90 day storage limit. These inappropriately designated hazardous wastes have to move as soon as possible. There are a number of reasons for this:</p>	<p>RESPONSE 8: All IDW will be handled and stored as if it were hazardous waste. However, classification of the IDW will be determined by analytical results from the investigation or from sampling of the IDW for waste purposes. Classification will be completed in less than 90 days so appropriate disposal can take place.</p>
<p>1) Wastes which have regulatory requirements have to be dealt with in the time frames prescribed in the same manner by all generators.</p>	<p>RESPONSE 1): Concur.</p>
<p>2) There is a considerable time difference between implementation of the Phase II Work Plan and the Final Record of Decision is reached, at which time the final treatment and disposal alternatives for soils remediation will be potentially addressed. This large difference in time does not allow for a timely follow through for implementation of the generator requirements.</p>	<p>RESPONSE 2): Concur.</p>
<p>3) If the Navy or any Potentially Responsible Party, PRP, for that matter were investigating a site with little potential for hazardous wastes, in the Site Inspection phase for instance, the IDW materials could be presumed to be nonhazardous due to the lack of evidence. In this case, however, the sites being investigated are presumed or documented to have had a release or a threat of release. As such they have to be handled as hazardous until the sample results show them to be nonhazardous. Keep in mind that this Phase II Work Plan is written to determine extent of contamination.</p>	<p>RESPONSE 3): The IDW will not be classified until analytical results from the investigation or specific waste samples are available. The IDW will be handled and stored following hazardous waste protocols but will not be classified as hazardous unless analytical results indicate this class of waste.</p>

**RESPONSE TO INVESTIGATION-DE... /ED WASTE MANAGEMENT PLAN (IDWMP)
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<p>Originator: William Lee Environmental Department, MCAS El Toro</p> <p>To: Joseph Joyce MCAS El Toro</p> <p>Date: Unknown</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>Please revise Section 6 as appropriate.</p> <p>How can the 50 cubic yards be dealt with in near future? Is it possible to include these wastes with the proposed Removal Actions? Lets discuss.</p>	<p>RESPONSE: We assume the "50 yards" refers to the Phase I RI Technical Memorandum reference to 50 yards of drummed designated wastes (page 2-53). No drums have been observed at the WSF or WSA and this drummed material was incorporated into the "burritos". The final disposition of the designated and non hazardous waste in the burritos will be assessed following the RI.</p>
<p>9 <u>Page 6-5.</u> See previous comments on storage of wastes. The IDW containing wastes should be labeled as hazardous until such time as they are no longer considered hazardous. This can occur by sampling results, treatment or some other acceptable manner.</p>	<p>RESPONSE 9: This IDW will not be classified as hazardous until analytical results indicate this class of waste.</p>
<p>10 <u>Page 6-7.</u> Please revise Figure 6-4 as follows:</p> <p>1) For the wastes which require treatment, post treatment should have an arrow/option to go through the currently designated waste decision box. I.e., if it is treated sufficiently it no longer has to go to an expensive Class I landfill.</p>	<p>RESPONSE 10 (1): Figure 6-5 revised to illustrate decisions made after treatment.</p>
<p>2) Is there an option to treat designated waste? If so can the treated waste be treated sufficiently to be addressed as non hazardous? These options should be included in Figure 6-3</p>	<p>RESPONSE 2): Treatment option added and decisions made after treatment.</p>
<p>3) See previous comments on the use of the term Designated Waste.</p>	<p>RESPONSE 3): Considered.</p>
<p>4) There may be additional options for non hazardous solid waste and/or treated wastes. Lets discuss.</p>	<p>RESPONSE 4): Optional add for disposal of nonhazardous solid waste at station landfill.</p>
<p>11. <u>Page 6-9.</u> Please add section 6.3.7 with the heading of Treated Waste. This section should identify the options for treated waste streams.</p>	<p>RESPONSE 11: Discussion of treatment added to various waste classifications, as appropriate.</p>