



BECHTEL NATIONAL INC.

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MCAS EL TORO  
SSIC # 5090.3

**CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT**

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**TO:** Jason Ashman, RPM (4 copies)      **DATE:** 03 May 1995  
Code 1831.JA      **CTO#:** 0059  
Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway, Building 128  
San Diego, CA. 92132-5187

**FROM:** J.W. Kluesener, Operations Manager      D.K. Cowser, Project Manager

**DESCRIPTION:** 25 April 1995 Meeting Minutes for CTO-0059, MCAS El Toro, California

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## MEETING MINUTES

<b>Meeting Subject:</b> Phase II RI/FS Work Plan and Field Sampling Plan, MCAS El Toro, California		<b>Meeting Date</b> April 25, 1995 <b>Meeting Time</b> 0830. <b>Meeting Place</b> BNI San Diego <b>Meeting Notes Prepared By</b> Patrick Brooks	
<b>Attendees: (*Part Time)</b>			
<u>Navy</u> Jason Ashman Ginny Garelick		<u>Bechtel</u> Patrick Brooks David Cowser *Irene Findikaki Tim Latas *David Liu Katrina Lyons John Scholfield Dante Tedaldi Pat Wiegand Stacie Wissler	<u>Other</u> Bonnie Arthur - U.S. EPA Sherrill Beard - Cal EPA Juan Jimenez - Cal EPA *Joseph Joyce - MCAS El Toro Vish Parpiani - MCAS El Toro Larry Vitale - CRWQCB
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Pat Wiegand			
Stacie Wissler			

MEETING MINUTES (continued)

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

The April 25 meeting began with Jason reminding the group that a meeting must be scheduled with the risk assessors and toxicologists. Joseph Joyce said he could not attend during the week of May 8, and David Liu said he is on vacation until May 8.

Tim Latas asked if the group had decided if an agreement had been reached as to the minimum number of samples to be submitted for laboratory confirmation. The consensus was that 10% of detects and 5% of non-detects was a minimum, but additional samples may be requested on a case-by-case basis after reviewing all available data. Ginny Garelick asked if a precedent had been set by the RFA on the minimum number of samples required for confirmation. Dante Tedaldi volunteered to check with Jacques Lord, the CTO Leader for the RFA at El Toro.

Tim Latas wanted to be sure that the proposed landfill work would satisfy water SWAT requirements. Larry Vitale responded that the work would satisfy the minimum water SWAT requirements.

Vish Parpiani said that the CLEAN II contractors should follow utility clearance procedures similar to those used by the CLEAN I contractors. David Cowser responded that all intrusive investigation would be preceded by a thorough utility clearance. Action Item No. 1 was to obtain information from the CLEAN I contractor on subsurface utility locations and clearance procedures.

Jason Ashman summarized the agenda for the meeting as a proposal for replacing the RI/FS work planned at some of the OU-3 sites with EE/CAs and removal actions. Jason's expectation was to go through the presentation and make a decision based on the information presented as to whether the Navy should continue on the course set by the RI/FS.

Juan Jimenez stated that the DTSC was not prepared to make decisions today.

Tim Latas offered that it may be helpful to schedule a field visit for Tuesday May 2 so the group could visualize the scale of the sites/units proposed for removal actions. The May 2 meeting at El Toro was agreed upon and became Action Item No. 2.

Tim Latas summarized the potential removal actions at El Toro by saying they can be initiated at the completion of the Phase I RI or Tier 1 of the Phase II RI, and may be prepared as non-time critical or time critical actions. Ginny Garelick added that time critical actions have been used at NTC San Diego. Bonnie Arthur stated that she prefers non-time critical actions except in the case of an emergency or the need for an accelerated schedule.

Tim described two deliverables required for removal actions. They included a Removal Action Work Plan and a Removal Action Site Close-out Report.

Juan Jimenez asked for a clarification of the "No Further Action Certification" (NFAC). He asked for examples of sites where it had been applied. A memo dated April 17, 1995 by Walt Sandza was distributed that asked that the term "No Further Remedial Action Planned" (NFRAP) be discontinued and replaced by NFAC. The memo also stated that "Our long-term goal is to obtain their NFAC for each/all of our IR sites." Ginny Garelick presented a copy of the Air Force NFRAP Guide, dated Summer 1994, and said the Navy would like to use it as a guide. In this document, the following four categories of NFAC were described:

1. NFAC based on the results of a qualitative risk assessment following the preliminary assessment (Category I).
2. NFAC based on the results of a semi-qualitative risk assessment following the site inspection (Category II).
3. NFAC based on the results of a baseline risk assessment following the remedial investigation (Category III).

MEETING MINUTES (continued)

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4. NFAC based on implementation of a remedial action following the removal or remedial action (Category IV).

Juan said that if the site is in the IR program, it must eventually go to a final ROD.

**Presentation on the proposed approaches for the OU-3 sites.**

Pat Wiegand described the criteria for "Recommended NFAC" as sites characterized by the following:

- Preliminary risk values (calculated using Phase I RI data) less than  $1 \times 10^{-6}$ ;
- COPCs may be present in shallow soil at low concentrations;
- Low concentrations or the absence of VOCs or fuel hydrocarbons in soil gas (based on available data);
- No reported history of releases; and
- Current site conditions do not suggest waste disposal at the site.

The recommended NFAC Units are

- Site 7 - Unit 2;
- Site 8 - Unit 2;
- Site 20 - Unit 1; and
- Site 22 -Unit 2.

Juan Jimenez asked that the word "cumulative" be added to preliminary risk and that ecological risk be considered.

**Risk Assessment Discussion**

David Liu gave a short summary of a field screening techniques proposed by DTSC and EPA risk assessors in which RBCs or PRGs would be divided by 100, and non-carcinogens divided by 10 to calculate preliminary risk values. David Liu did not like this approach. The group had many questions as to the origin and practicality of this method and discussion was stopped pending further review.

David Liu asked if the baseline risk assessment should be written using only Phase I RI data or if it was better to wait and include Phase II RI data. Bonnie Arthur said that John Christopher would like it to include Phase II data. Ginny Garelick and Jason Ashman agreed. Action Item No. 3 was to include a discussion of the risk assessment work plan schedule with the conference call scheduled earlier to discuss RBCs vs. PRGs. Action Item No. 4 was for David Liu to provide support information for the conference call. Juan asked that the risk assessment be focused to justify a removal action for EE/CA sites. Bonnie Arthur added that she would like to see the risk for industrial use presented to see if removal is only necessary under a residential scenario. Juan and Joseph will work together to set up a conference call number.

The group discussion returned to the proposed approaches for the OU-3 sites.

Bonnie Arthur asked that the site maps be modified to include concentration data for each of the units that are proposed for removal actions or NFAC. David Cowser said that could be provided by the May 2 meeting at El Toro. Modification of the maps became Action Item No. 5.

Pat described the criteria for "possible NFAC" as sites characterized by the following:

- Preliminary risk values generally between  $<1 \times 10^{-6}$  and  $5 \times 10^{-6}$ ;
- COPCs were identified in soil samples by concentrations were below RBCs;
- More sampling data necessary to confirm NFAC recommendation; and

MEETING MINUTES (continued)

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- Site history does not support a significant release.

Sites recommended for possible NFAC are:

- Site 6 - Units 1 and 2;
- Site 7 - Unit 4;
- Site 8 - Unit 5;
- Site 10 - Units 1 and 2;
- Site 16 - Units 1 and 3;
- Site 19 - Unit 3; and
- Site 21 - Unit 1.

Pat Wiegand described the criteria for "possible removal actions" as sites characterized by the following:

- Preliminary risk generally between  $5 \times 10^{-6}$  and  $5 \times 10^{-5}$ ;
- COPCs were identified in soil samples and some may approach or exceed their RBCs;
- More sampling data necessary to confirm removal action recommendation;
- Site history may support releases;
- Soil staining reported or identified on aerial photographs; and
- Soil contamination appears to be limited to shallow soil (less than 10 feet bgs) and it is estimated that potential remedial alternatives can be implemented within appropriate cost and time restraints.

Sites recommended for possible removal action include the following:

- Site 7 - Unit 5;
- Site 11 - Unit 3;
- Site 12 - Units 1 and 4;
- Site 20 - Unit 4; and
- Site 22 - Unit 1.

Pat Wiegand described the criteria for "recommended removal action" as sites characterized by the following:

- Preliminary risk values generally  $5 \times 10^{-5}$  or greater and/or fuels present at concentrations exceeding 1,000 mg/kg;
- COPCs were identified in soil samples and some exceed their RBCs;
- Shallow soil is contaminated;
- Data sufficient to select a treatment technology; and
- Soil contamination appears limited to shallow soil and it is estimated that the removal action can be completed within the appropriate cost and time constraints.

Sites that are recommended for removal action are the following:

MEETING MINUTES (continued)

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- Site 7 - Unit 3;
- Site 8 - Units 1 and 4;
- Site 12 - Unit 3;
- Site 15 - Unit 1; and
- Site 19 - Unit 1.

The final category of site was remedial action or unknown. They are characterized by the following:

- Preliminary risk value, if available, may not reflect actual site conditions;
- No preliminary risk value was calculated - Available data deemed unsuitable;
- Unit is new and no soil sample analytical data is available for preliminary risk calculation; and
- Site conditions may suggest unit is likely to remain part of the long-term RI/FS process rather than going to NFAC or Removal Action.

Sites recommended for remedial action or unknown are the remainder of OU-3 site/units.

Tim Latas reminded the group that non-time critical removal actions require an EE/CA and time critical removal actions do not need an EE/CA to be prepared. Juan added that the three possible decisions regarding the sites are:

1. No further action at this time;
2. Removal action (emergency, time-critical, and non-time critical); and
3. Remedial Action.

Pat Wiegand added that under all three possible scenarios, a baseline risk assessment must be conducted before the site can go to a ROD.

A reference document was distributed that will be used on the May 2 field visit to El Toro. Bonnie asked if the removal actions are not funded, will the RI/FS encompass the sites that are requested to be omitted from review? Jason informed her that the sites will be funded. Juan asked how the additional removal actions will be conducted if removal is stopped thinking that the process is over. David Cowser responded that because the contract is cost-plus, the process would be continued (within reason) until finished.

Bonnie Arthur asked if it was possible to break off a unit from a site stating that no further action is necessary at this time. It was agreed that risk assessments would not be done on individual units, and that no further action units would be handled as part of a sitewide assessment covering all units within a site. A discussion ensued about how to document the BCT's decision on units recommended for no further action or Removal Actions. It was agreed that a statement signed by the BCT stating agreement or disagreement with "no further action at this time" or Removal Action designations was sufficient.

A discussion followed on how to handle the EE/CA sites in the revised Work Plan. It was decided that the Sites for which EE/CAs are being prepared, the RI/FS activities would be omitted from the revised Work Plan. A decision would be made regarding additional OU-3 sites proposed for removal actions by May 20th and then these sections would be revised in the revised Work Plan. Juan added that Navy could propose a no further action at this time, support it with data, and include a signature page for the BCT, but removal actions do not belong in the Work Plan.

#### EE/CAs at Landfill Sites

Tim Latas said that Sites 2 and 17 are candidates for presumptive remedy, but Sites 3 and 5 may not require additional capping. He asked if the EE/CA process could be used at these sites.

MEETING MINUTES (continued)

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Larry Vitale responded that Chapter 15 requirements are applicable only to leaking landfills. No action other than four quarters of groundwater monitoring would be necessary at non-leaking landfills.

Katrina Lyons asked if we could complete the RI and finish the job using the EE/CA process at Sites 2 and 17.

Juan Jimenez responded that there are ecological issues to be addressed, but this could be considered.

The meeting ended at 1500.

MEETING MINUTES (continued)

Item No.	Action Items	Responsible Individual	Due Date/ Status
1.	Obtain utility clearance information from CLEAN I contractors.	Jason Ashman Andy Piszkin Dave Cowser	May 22
2.	Field meeting at El Toro on May 2 to discuss proposed actions at OU-3 sites.		May 2
3.	Fax agenda items to Juan by May 2 for tentative risk conference call.	Dante Tedaldi	May 2
4.	Provide support information for conference call.	David Liu	TBD
5.	Prepare unit maps with concentration values.	Bechtel	May 2
6.	BCT decision on other potential removal actions.	BCT	May 20
7.	Decision from BCT regarding potential NFAC sites.	BCT	May 20
8.	Develop document to submit to BCT with four units proposed for "no further action" and include a signature page for BCT.	Bechtel	TBD
9.	Develop document to submit to BCT with four units proposed for "removal action" and include a signature page for BCT.	Bechtel	TBD
10.	EE/CA comments are due June 20.	BCT	June 20

**Issues Bin:**

1. Determine percent of field screening samples that will be submitted to lab for confirmation.
2. Ensure that RI/FS fieldwork meets SWAT requirements.
3. Ensure that utility clearances are performed.
4. Provide NFAC success stories.
5. The only RI/FS work to be completed at Site 1 will be monitoring well installation.