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BECHTEL NATIONAL INC.

**CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT**

Contract No. N-68711-92-D-4670

Document Control No. CTO-0059/ 0090

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

DATE: 5 April, 1995

FROM:   
J. Kluesener, Operations Manager

D. Cowser, Project Manager

DESCRIPTION: Response to Regulatory Agency Comments to the Draft Data Management Plan, Phase II Remedial Investigation/Feasibility Study, for CTO-0059, MCAS El Toro, California

TYPE: Contract Deliverable  CTO Deliverable Request for Change/Project Not

CATEGORY: Preliminary Draft Preliminary Final Draft  Final

SCHEDULED DELIVERY DATE: 4/3/95 ACTUAL DELIVERY DATE: 4/05/95

NUMBER OF COPIES SUBMITTED: Four (4)

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CLEAN II Program  
Bechtel Job No. 22214  
Contract No. N68711-92-D-4670  
File Code: 0219  
IN REPLY REFERENCE: CTO-0059/ 0090

5 April, 1995

Jason Ashman, RPM  
Code 1831.JA  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92131-5187

Subject: Response to Comments for CTO-0059  
MCAS El Toro, California

Dear Mr. Ashman:

Enclosed are four copies of the Response to Comments for CTO-0059, Phase II Remedial Investigation/Feasibility Study at MCAS El Toro, California. This document was prepared under Contract No. N68711-92-D-4670.

The appropriate number of copies of this document has been submitted to the individuals on the attached distribution list.

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

Sincerely,



David K. Cowser  
Project Manager

cc: Attached List

Attachment: Response to Comments



Bechtel National, Inc. Systems Engineers-Constructors

## CTO-0059 RESPONSE TO COMMENTS DISTRIBUTION LIST

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**RESPONSE TO REGULATORY AGENCY COMMENTS**  
**Draft Data Management Plan**  
**Phase II Remedial Investigation/Feasibility Study**  
**MCAS El Toro, California**

Originator: Juan Jimenez, California Environmental Protection Agency,  
 Department of Toxic Substance Control  
 Written To Tim Latas on January 20, 1995  
 Date: 4 April, 1995

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**General Comments:**

- 1: For all future submittals, please use both sides of the sheet.
2. It would help considerably to know how the referenced information can be readily accessed. For example, how will the regulators and the public have access to the CLEAN II program Data Management Plan located at an undisclosed Bechtel National Inc. (BNI), location.
3. Please spell out each acronym the first time it appears in the text.
4. The Hazardous Materials Laboratory and the Regional Water Quality Control Board, Santa Ana Region, have provided comments. They are attached.
5. Please enhance the discussion on all aspects of the data transfer between the Navy's CLEAN I and CLEAN II contractors. What has taken place, what is left to do, and any successes or problems.
6. Please enhance the sections on the collection field samples.

**Responses to General Comments:**

1. A memo has been issued 03/24/95 conveying this request to the CLEAN II El Toro CTOLs and PM.
2. The reference in Section 6 has been expanded to include a contact name and phone number. Also, every cover sheet to a report has BNI's address.
3. Explanation of acronyms at the first appearance is CLEAN II document format policy. The author(s) regret the error.
4. The attached comments are addressed in this comment and response document.
5. Section 5.5, Data Transfer, has been added to Chapter 5 to address this comment.
6. This discussion of how and why field samples will be collected is in the Field Sampling Plan and Quality Assurance Project Plan. The Data Management Plan addresses how the data will be handled and manipulated after it is collected.

**Specific Comments**

**COMMENT 1: Page 4-1, para. 8. Who decides whether to implement "...(1) double data entry and subsequent file comparisons and (2)**

**RESPONSE 1: Text has been modified in Section 4.2, paragraph 5, to include the following sentence: "The CTO Leader, or designee, will decide on the**

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**Draft Data Management Plan**  
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Originator: Juan Jimenez, California Environmental Protection Agency,  
Department of Toxic Substance Control  
Written To Tim Latas on January 20, 1995  
Date: 4 April, 1995

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**rechecking of output documents by both the originator of the data and a second checker." or the minimum?**

**How will this be flagged on the data presented to the Department**

**COMMENT 2: Page 5-2, para 2. What level of access will regulator get? Will training and an access code be provided in the near future? Please discuss.**

verification method(s) used during data modification and entry."

The Department will receive Data Base change Request forms as a part of the project records in Document Control. In addition, DATA USAGE codes are a part of the data base.

**RESPONSE 2:** The level of access available to the regulators will be total, according to Chris Kyburg, SWDIV. Regulators will have access through a modem (yet to be installed) to the existing ITEMS database. BNI will provide CLEAN II data to the Navy in the NEDTS format and the Navy will transfer that data into the ITEMS data base. The DMP does not discuss ITEMS since BNI's scope of work is to deliver the data in NEDTS format as a final product.

**RESPONSE TO REGULATORY AGENCY COMMENTS**  
**Draft Data Management Plan**  
**Phase II Remedial Investigation/Feasibility Study**  
**MCAS El Toro, California**

Originator: Larry Vitale, California Regional Water Quality Control Board  
Written To: Tim Latas on January 6, 1995  
Date: 4 April, 1995

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**Specific Comments**

**COMMENT 1: A table for stratigraphy should be included in the list of Table Types. The table will aid in characterizing the sites and enable reviewers to more efficiently evaluate the site geology.**

**RESPONSE 1: The reviewer's point is well taken on the usefulness of stratigraphy information. This information is already a part of the proposed data base structure under the table names SOIL\_BORINGS and LITHOLOGY. These tables are some of the tables to be populated by the gINT geotechnical software, and will include stratigraphy, lithology, descriptions, and observations, blow counts, sample recovery percent, etc., as recorded in gINT.**

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Originator: Bart Simmons, Cal/EPA Hazardous Materials Laboratory  
Written To: Tim Latas on December 29, 1994  
Date: 4 April, 1995

**Specific Comments**

**COMMENT 1: Section 3, Table 3-1. Method quantitation limits, sample detection limits, and sample quantitation limits should be added to the data base. The reporting limits for a sample may be different than the method limit due to interferences or dilution, and the difference should be recorded. Risk assessment may use sample detection limits or quantitation limits for results below the reporting limit.**

**RESPONSE 1:** Author(s) agree with the comment, and have clarified Table 3-1 with the following text: "Table Name is the equivalent to a NEDTS File Name." In fact, the requested detection limit data is a part of the table named RESULTS.

**COMMENT 2: Section 3.5.2, Field Analysis Data. Commercially available immunoassays are not calibrated with two or more standards as described. This discussion should be revised or eliminated, since it should be covered by the Work Plan or Quality Assurance Project Plan.**

**RESPONSE 2:** The reference in Section 3.5.2 to immunoassay has been eliminated. It is more properly included in the Field Screening Data (Section 3.5.1) along with reference to the other screening techniques that will be used in El Toro field activities.

**COMMENT 3: Section 3.5.3, Laboratory Analysis Data. The format of the electronic data deliverables should be described. If it does not follow an EPA Contract Laboratory Program (CLP) format or Analytical Instrument Association (AIA) standard, its origin should be explained.**

**RESPONSE 3:** Text has been revised to include Table 3-2, CLEAN II ELECTRONIC FORMAT FOR DATA DELIVERABLES. This electronic deliverable format is specific to CLEAN II and originates from the Technical Specification 22214-TS-002. This format is compatible with the Bechtel Environmental Integrated Database Management System (BEIDMS).

**COMMENT 4: Section 4.3, Data Validation and Review**

**COMMENT 4a: The Naval Facilities Engineering Service Center (NFESC) Level D data QC guidance is referenced but not supplied. I do not have a copy of this guidance, and it is not referenced in the Data Quality Management of the MCAS El Toro Phase II RF/FS Draft Quality Assurance Project Plan (QAPP), dated 9 November 1993. Either the Data Management Plan or the QAPP should be revised to be consistent.**

**RESPONSE 4a:** The reference to NFESC is followed by the following text: "formerly NEESA)". The Department has requested that references to present standards be labeled as "NFESC," with the original "NEESA" acronym used as a bibliography reference only.

**COMMENT 4b: Qualification flags for laboratory reporting should be distinguishable from flags for data validation.**

**RESPONSE 4b:** Laboratory qualification flags and reviewer's validation flags are two separate fields within the data base.

**RESPONSE TO REGULATORY AGENCY COMMENTS**  
**Draft Data Management Plan**  
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Originator: Bart Simmons, Cal/EPA Hazardous Materials Laboratory  
Written To: Tim Latas on December 29, 1994  
Date: 4 April, 1995

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**COMMENT 4c: Program Procedure (PP) T2.4, Data Review, is also referenced but not provided. I do not have a copy of this document. This document should be added as an appendix or abstracted to show consistency with the QAPP, the NFESC guidance, and the EPA functional guidelines for data validation.**

**COMMENT 4d: The data review as described in this section implies data will be qualified on not only quality control data, but also based on sampling objectives, design, and sample collection. This is a valuable plan, but it may require more qualifiers than those in the EPA functional guidelines. The Data Management Plan should be revised to describe what qualifiers will be used for data with inadequate sampling objectives, sampling design, or sample collection**

**RESPONSE 4c:** Controlled copies of CLEAN II PPs have been delivered to regulatory agencies, including PP T2.4, Data Review. Text in Section 2.1 has been revised to include a brief summary description of each of the referenced PPs. Furthermore, PP T2.4 is currently under revision to reflect current CLEAN II data review practices, and the regulators are on distribution for the new issues of revised procedures.

**RESPONSE 4d:** Text has been inserted after Section 4.3., para. 3, to include an example and description of the use of the Sample Selection Form, or SSSF. This form will be used by both the sampler and the data reviewer to assemble information found elsewhere (logbooks, analysis requests, data review reports) on one piece of paper so that a sample's history from the sampler's and reviewer's perspective is easily retrievable and available in the project records.

**RESPONSE TO REGULATORY AGENCY COMMENTS**  
**Draft Data Management Plan**  
**Phase II Remedial Investigation/Feasibility Study**  
**MCAS El Toro, California**

Originator: Bonnie Arthur, U.S. EPA Region IX Board  
Written To Tim Latas on January 24, 1994  
Date: 4 April, 1995

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**COMMENT 1: Page 2-1, please include brief summaries of the Program Procedures.**

**RESPONSE 1:** Text in Section 2.1 has been revised to include the requested brief summaries.

**COMMENT 2: Figure 2-1, figure should be specific to El Toro**

**RESPONSE 2:** Title block in Figure 2-1 has been revised to read "MCAS El Toro, Santa Ana, California," rather than "Naval Training Center, San Diego."

**COMMENT 3: Page 3-1, please elaborate on the timing of the data transfer between CLEAN II and CLEAN II. This is an essential element of an efficient and timely transition.**

**RESPONSE 3:** Section 3.1., paragraph 4, has been revised from CLEAN II will transfer geographical elements of the CLEAN I GIS..." to read "CLEAN II has received geographical elements of the CLEAN I GIS..."

The CLEAN I El Toro RI/FS data has been transferred to the Navy, and CLEAN II is waiting for response from requests to the Navy for that data.

**COMMENT 4: Provide frequencies of the collection of field analyses data.**

**RESPONSE 4:** The Data Management Plan addresses the management and manipulation of data and measurements already collected. The frequency (and other procedures) for collecting these measurements is activity-specific and is addressed in the Quality Assurance Project Plan and Field Sampling Plan.

**COMMENT 5: Page 3-5, please provide a sample data entry form**

**RESPONSE 5:** Section 3.6 text has been revised to incorporate Figure 3-1, an example of the field transfer form.