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TO: Jason Ashman, RPM (1 copy) DATE: 5/19/95
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DESCRIPTION: Response to Regulatory Agency and Navy Comments on Preliminary Draft Engineering Evaluation/Cost Analysis (EE/CA) for Site 13, MCAS El Toro

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May 19, 1995

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

Attention: Jason Ashman
Code 1831.JA

Subject: Response to Regulatory Agency and Navy Comments on Preliminary Draft Engineering Evaluation/Cost Analysis (EE/CA) for Site 13, MCAS El Toro

Dear Mr. Ashman:

This letter summarizes the responses to comments received from the United States Environmental Protection Agency (U.S. EPA), California Environmental Protection Agency (Cal/EPA), and the U.S. Naval Facilities Engineering Command, Southwest Division (SWDIV) on the preliminary draft Engineering Evaluation/Cost Analysis (EE/CA) for Site 13 (former Oil Change Area). The preliminary draft EE/CA was submitted to these agencies in December 1994. Because this document is a preliminary draft and is intended to present the content and approach required by the Navy, a formal response to comment document has not been prepared. This letter presents responses to comments on the major significant issues, including:

- public participation
- extent of contamination
- risks values
- cleanup levels
- cost estimates
- removal action schedule
- applicable or relevant and appropriate requirements (ARARs)

Public Participation: A brief description of the public participation process and the community relations plan has been added to the EE/CA. Public review and comments will occur following the issuance of the final EE/CA. This description is presented in the Introduction (Section 1) of the EE/CA.

Extent of Contamination: The statement regarding the "delineation" of the extent of contamination has been modified to read as follows: "Analytical data from the Phase I remedial investigation have been used to assess the nature and extent of contamination." Additional statements about further characterizing the site through remedial investigation processes are included in Section 3.2 of the draft EE/CA.

Risks Values: Phase I Remedial Investigation (RI) risk-based concentrations (RBCs) corresponding to an individual human cancer risk of one in a million (10^{-6}) were used to develop cleanup levels. The cancer risk of 10^{-6} was chosen because of the possibility of residential use.

The Phase I RI preliminary risk assessment also assessed the potential effects of the chemicals on plants and wildlife. In the ecological risk assessment, published toxic and nontoxic concentrations of each chemical to terrestrial and aquatic invertebrates and vertebrates were compared with the measured concentrations of the chemicals. The results of the ecological risk assessment suggested that the concentrations of some of the chemicals (lead, mercury, and benzo(a)pyrene) exceed screening criteria for potential ecological concern. However, no sensitive habitats, plants, or animals at the site have been reported at Site 13.

Cleanup Levels: At this time, no additional site investigation studies are planned under the Phase II Remedial Investigation and Feasibility Study (RI/FS) at Site 13. The Navy has sampled for metals, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, polychlorinated biphenyls (PCBs), and petroleum hydrocarbons at the site under the Phase I RI. Metals were determined not to pose a threat, as is now shown in the draft EE/CA. However, lead was detected at one surface sample above the Cal/EPA 1994 Preliminary Endangerment Assessment (PEA) Guidance Manual screening level of 130 mg/kg inorganic lead in soil, but below the February 1995 U.S. EPA Region IX preliminary remediation goal (PRG) of 400 mg/kg. This will affect the treatment strategy for the lead-contaminated soil, as well as the confirmation sampling strategy, as is discussed in the Draft EE/CA in Section 3.2. Soil that is contaminated with analytes that cannot be treated in the thermal desorption unit will be transported off-site and disposed in an appropriate hazardous waste landfill.

The data for polynuclear aromatic hydrocarbons (PAHs) with RBCs below analytical detection limits are inconclusive as to whether the RBCs were exceeded. Benzo(a)pyrene was detected in 1 of 23 samples. Based on this information, the extent of contamination for PAHs is unknown. However, the extent of PAH contamination is assumed to be similar to the extent of total recoverable petroleum hydrocarbons (TRPH) contamination, because PAHs are usually associated with petroleum hydrocarbons. The confirmation sampling includes PAH analytical methods with detection limits low enough to determine whether PAH cleanup objectives have been met.

The cleanup goal for TRPH is proposed as 1,000 mg/kg. The treatment goal is 100 mg/kg or a concentration attaining a 90-percent reduction in the TRPH concentration, whichever is less, as described in Section 3.5 of the draft EE/CA.

The TRPH sampling and analysis will be an indicator for the presence of benzo(a)pyrene (and other PAHs, if present). The TRPH analysis can be used to screen for PAHs because the analysis can be completed relatively quickly on-site, whereas the PAH analysis with lowered detection limits must be conducted off-site at an U.S. EPA Contract Laboratory Program (CLP) analytical laboratory.

Excavation will continue until TRPH screening analyses meet TRPH cleanup goals and no visible staining of soil is observed. To confirm that benzo(a)pyrene and other PAH removal cleanup goals have been achieved, confirmation samples will be taken and analyzed at an off-site CLP laboratory for chemicals of potential concern (COPCs) including VOCs, SVOCs, pesticides, metals, total fuel hydrocarbons (TFH) as gasoline and diesel, TRPH, and PAHs. If confirmation sampling analytical results indicate that removal cleanup goals have not been met for certain analytes, the iterative removal process will continue until removal cleanup goals are met. Once removal cleanup goals have been achieved, the excavation will be backfilled with clean soil and the surface will be restored.

The cleanup levels for pesticides and inorganics (except lead) are the Phase I RI RBCs or background concentrations, whichever is greater. The cleanup levels for VOCs, SVOCs, and PCBs are the Phase I RI RBCs. The cleanup level for lead is the Cal/EPA screening level of 130 mg/kg at depths from the surface to 2 feet below ground surface (bgs) and the U.S. EPA Region IX PRG of 400 mg/kg at depths greater than 2 feet bgs. The Cal/EPA screening level and the U.S. EPA PRG are used as RBCs for lead. TRPH and TFH cleanup goals are obtained from the Leaking Underground Storage Tank (LUFT) state guidance and accepted standards of practice in southern California. If an RBC is not developed for a chemical, the U.S. EPA Region IX PRG is used.

Samples collected during the excavation procedure will be analyzed for TRPH on-site by a field analytical laboratory using U.S. EPA Method 418.1. U.S. EPA Method 8015M will not be used for field screening, because TFH concentrations using diesel and gasoline standards detected in soil during the Phase I RI using Method 8015M did not exceed cleanup goals or LUFT levels. TRPH concentrations detected using U.S. EPA Method 418.1 did exceed the cleanup goal of 1,000 mg/kg in soil.

Treatment alternatives screening were based on the criteria of effectiveness, implementability, cost, similar contamination at the other sites, and use of a common treatment facility. These alternatives included *in situ* bioremediation, incineration, stabilization, soil washing, and disposal of untreated soil at a proper off-site facility. Further consideration of other possible alternatives shows significant deficiencies compared to the preferred removal action alternatives. Also, because the preferred alternatives rely on proven technologies, treatability tests will not be conducted on the preferred alternatives recommended in the EE/CA. In addition, a "no-further action" alternative is included in the alternatives evaluation.

Cost Estimates: The cost analysis sections have been expanded to describe cost assumptions and the principal differences among the alternatives. Dollar amounts associated with each alternative are included. Confidence levels have been assigned to the costs.

Mr. Jason Ashman

May 19, 1995

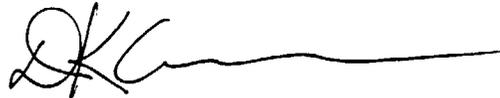
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Removal Action Schedule: Factors affecting the removal action schedule are described in Section 3.3 of the draft EE/CA. In particular, the Navy will prepare an Action Memorandum that documents the decision to select an appropriate removal action after public review and comment. A timeline illustrating the milestones for this removal action will be provided in the Action Memorandum.

ARARs: The applicable or relevant and appropriate requirements (ARARs) section includes groundwater ARARs. Though no sources of groundwater contamination are suspected at Site 13, groundwater ARARs are included to document restrictions of potential releases of contaminants to groundwater.

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

Very truly yours,

A handwritten signature in black ink, appearing to read 'DKC', followed by a long horizontal line extending to the right.

David Cowser
Project Manager

DC/sp