



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0059/0294

File Code: 0212

TO: Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Paul Kennedy, Code 0233.PK (OE)
Building 128
1220 Pacific Highway
San Diego, CA 92132-5187

DATE: 4/2/96
CTO #: 0059
LOCATION: MCAS El Toro

FROM: [Signature]
D. K. Cowser, Project Manager

DESCRIPTION: Field Change Notice for the MCAS El Toro Investigation-Derived Waste
Management Plan, DTD 4/2/96

TYPE: Contract Deliverable (Cost) X CTO Deliverable (Technical) Other
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O = Original Transmittal Sheet
C = Copy Transmittal Sheet
E = Enclosure

Date/Time Received



401 West A Street
Suite 1000
San Diego, CA 92101-7905

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

IN REPLY REFERENCE: CTO-0059/0294

April 2, 1996

Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Paul Kennedy, Code 0233.PK
Building 128
1220 Pacific Highway
San Diego, CA 92132-5187

Subject: Field Change Notice for the MCAS El Toro Investigation-Derived Waste Management Plan

Dear Mr. Kennedy:

This Field Change Notice (FCN) documents revisions to the CTO-0059 Investigation-Derived Waste Management Plan (IDWMP). The FCN is being distributed to the recipients of the original document for "incorporation", which is to say you should attach the FCN to your copy of the original IDWMP since there is no plan to revise and reissue that document.

Very truly yours,

Dave K. Cowser
Project Manager

DKC/sp

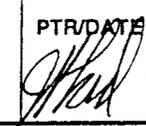
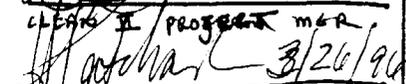
Enclosure: Field Change Request/Field Change Notice



Bechtel National, Inc. Systems Engineers-Constructors

FIELD CHANGE REQUEST/FIELD CHANGE NOTICE

Navy CLEAN II PP: T 3.2
 Rev: 0
 Date: 10/14/94
 Page: 1 of 4
 Attachment: A

		FIELD CHANGE REQUEST/FIELD CHANGE NOTICE JOB NO. 22214		Page 1 of 10 12 DOCUMENT NO. IDW/59/0068	
DRAWING, SOP, OR SPECIFICATION NUMBER	REV NO.	DRAWINGS OR SPECIFICATION CHANGES	PREPARED BY AND DATE		
FINAL IDW MANAGEMENT PLAN-EL TORO	1	REVISE SECTION 6 TO REFLECT REQUESTS BY CLIENT AND TO UPDATE TO CURRENT CONDITIONS.	HANK BACHNER & J.P. LORO 2-28-96		
EXISTING CONDITION					
SEE ATTACHED PAGES 2, 4, 6, 8.					
REASON FOR CHANGE					
1) SEE REQUEST FROM CLIENT ON PAGE 10 2) ADDITIONAL CHANGES MADE TO REFLECT CURRENT CONDITIONS, E.G. OHM CORP. IS OCCUPYING THE WASTE STORAGE AREA AND IT'S NOT AVAILABLE.					
DESCRIPTION OF CHANGE					
SEE ATTACHED PAGES 3, 5, 7, 9.					
		CHANGE APPROVED YES <input type="checkbox"/> NO <input type="checkbox"/>	REQUESTED DATE OF FCR DISPOSITION 2-28-96	PTR/DATE  2-28-96	
FCN APPROVED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		FCN INCORPORATION 3-26-96	TECHNICAL ASSESSMENT MANAGER/DATE  2/28/96		
REMARKS					
EL TORO STATION APPROVAL OF FCR:  2/29/96  3/26/96 CLEAN II PROJECT MGR EL TORO FACILITY REP.					

EXISTING

Section 6

WASTE HANDLING AND DISPOSAL

This section discusses Phase II RI/FS waste handling documentation and disposal control issues. Additionally, waste generated and stored during Phase I RI/FS field activities is discussed.

6.1 PHASE I REMEDIAL INVESTIGATION/FEASIBILITY STUDY WASTE

A waste storage facility (WSF) was constructed at MCAS El Toro for long-term storage of drill cuttings and solids generated from drilling mud and wastewaters with a high solids content during the Phase I RI/FS. The WSF is an unlined, bermed, 200- by 450-foot area that is situated on top of Site 5 (Perimeter Road Landfill) (Figure 6-1). It is divided into two approximately equal cells for storage of nonhazardous and designated wastes. The north half (referred to as the "clean" area) stores nonhazardous wastes; it has a 1-foot berm. The south half stores designated wastes; it has a 3-foot berm. Phase II RI/FS nonhazardous and designated IDW will be stored at the WSA. The wastes transferred to the facility are to be stored until final treatment and disposal alternatives for the landfills have been evaluated.

6.2 INTERIM WASTE HANDLING FOR PHASE II REMEDIAL INVESTIGATION/FEASIBILITY STUDY

All drill cuttings, waste sediments, development and purge water, decontamination wash water, and used PPE will be placed in labeled Department of Transportation 17H 55-gallon drums, tanks, or roll-off bins and will be stored on-site in the designated areas (Figure 6-1). Each container of waste will be clearly marked to indicate the waste source and contents. In this way, results of individual samples can be traced back to specific waste containers. Procedures for storing, labeling, documenting, and tracking the IDW follow.

Waste containers will be placed in the WSA (as discussed below), not left at widespread points of generation. The SHSPs will also provide details of emergency response and spill-control procedures. The IDW containers will be labeled as "Investigation-Derived Waste." Disposition of IDW will be determined within a period of 90 days from the date of generation. Hazardous waste will be transported to an appropriate disposal facility before the 90-day period expires.

CHANGE

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Waste containers will be placed in the WSA (as discussed below), not left at widespread points of generation. The SHSPs will also provide details of emergency response and spill-control procedures. The IDW containers will be labeled as "Investigation-Derived Waste." Disposition of IDW will be determined within a period of 90 days from the date of generation. Hazardous waste will be transported to an appropriate disposal facility before the 90-day period expires. *Because MCAS El Toro is a CERCLA listed facility, waste disposal within 90 days is not a requirement, but an effort will be made to comply.*

FCR: IDW\59\0068
DATE: 2-28-96
PAGE: 4 of 12
BY: [Signature]

EXISTING

6.2.1 Waste Storage Area

The WSA was established during the Phase I RI/FS and will be used during Phase II RI/FS field activities. It is located on the north side of the intersection of North Marine Way and the Gate 2 entrance road, and is situated on top of Site 3 (Original Landfill) as shown on Figure 6-1. The WSA is a 482- by 123-foot concrete pad that slopes at a 1-percent cross fall toward the east/west centerline and at a 2.5-percent cross fall on the east/west centerline into a 1-foot-wide trench drain. In the event of rain, water collected within the WSA was designed to drain to the trench drain and be collected in a concrete sump (10 by 10 by 4 feet). Water from the sump could then be pumped automatically into two 22,000-gallon Baker tanks for processing by the GAC system. The WSA and the surge tank capacity of the GAC system were designed to contain and treat rainwater generated by a 25-year, 24-hour rainfall event. The WSA pad will be used to store containers of hazardous waste. Containers with nonhazardous waste will be placed on plastic sheeting spread in the unpaved areas of the WSA.

Appropriate wastewaters will be processed through the on-station GAC system during the Phase II RI/FS. The GAC system is located within the WSA, which in turn is situated on top of Site 3 (Original Landfill) as shown on Figure 6-1. The GAC system consists of three 2,000-pound-capacity GAC adsorber units connected in series (with two feedwater pumps) to "Y" strainers, two basket strainers, and one bag filter (Figure 6-2). An "Operations Manual" for this system along with discharge requirements is to be provided before CLEAN II operations begin. The GAC system will be operated by the RAC contractor and will be responsible for arranging appropriate operation, maintenance, and discharge requirements.

Per agreement with the regulatory agencies, during Phase I RI/FS field activities, rainfall runoff collected at the WSA while IDW was present was treated by the GAC system prior to discharge to the base golf course. For Phase II RI/FS field activities, it is planned to continue this process.

6.2.2 Container Labeling

Each container of IDW will be labeled to indicate the contents, source, and nature of the waste. Labeling will consist of either placing durable, adhesive labels on the container, placing appropriate information in a plastic envelope, or using paint pens to label the containers. The process of labeling 55-gallon drums will involve placing two labels on each drum, one on the exterior side of the drum and one on the inside surface of the lid. Baker tanks and roll-off bins will also be marked with a minimum of two labels. The labels will contain the following information:

- site identification,
- well or boring identification,
- date of generation,
- nature of contents (e.g., soil cuttings, purge water), and
- approximate depths from which waste was collected (for soil borings).

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DATE: 2-28-96
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CHANGES

Section 6 Waste Handling and Disposal

6.2.1 Waste Storage Area

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Per agreement with the regulatory agencies, during Phase I RI/FS field activities, rainfall runoff collected at the WSA while IDW was present was treated by the GAC system prior to discharge to the base golf course. For Phase II RI/FS field activities, it is planned to continue this process. The discharge water will be sampled periodically to confirm the treated water released to the golf course is of acceptable quality.

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EXISTING

Section 6 Waste Handling and Disposal

Containers storing wastes that are not yet characterized will be labeled as "awaiting results of analysis."

6.2.3 Waste Tracking

Control of the generation and disposal of IDW will be maintained by implementing a waste-tracking inventory. This system consists of inventory forms, which are completed or updated after each field event for each container of waste. The inventory form provides the following information:

- site identification,
- origination point of the waste (well or boring identification),
- waste matrix,
- approximate volume of waste,
- date of waste generation,
- date waste transferred to the WSA,
- method of storage and reference number,
- analytical results associated with the waste,
- date of additional sampling,
- date of waste classification,
- date of waste treatment or disposal, and
- method of disposal.

A copy of the waste tracking form is provided as Figure 6-3. Disposition of the IDW will be determined during a period of 90-days following generation; hazardous waste will be disposed at an appropriate facility before the 90-day period expires.

6.2.4 Waste Sample Control

Documentation and tracking protocols for waste samples will consist of properly handling and documenting the sample shipment according to the CLEAN II SOP 9, Sample Containers, Preservation, and Handling; and SOP 10, Sample Custody, Transfer, and Shipment. Sample containers will be labeled with the following information:

- site identification,
- well or boring identification,
- sample ID number,
- sample depth (if applicable),
- date and time of sample collection,
- media type,

CHANGES

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- date of waste classification,
- date of waste treatment or disposal, and
- method of disposal.

A copy of the waste tracking form is provided as Figure 6-3. ~~Disposition of the IDW will be determined during a period of 90-days following generation; hazardous waste will be disposed at an appropriate facility before the 90-day period expires.~~ *BECAUSE MCAS EI TORO IS IN URBAN AREA, THE 90-DAY PERIOD IS NOT ENFORCEABLE. AN EFFORT WILL BE MADE TO LOCATE A FACILITY.*

6.2.4 Waste Sample Control

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EXISTING

- analytical method, and
- preservative, if applicable.

Waste sample tracking will be documented in the site investigation sample collection notebook, described in CLEAN II SOP 10, Sample Custody, Transfer, and Shipment.

6.3 WASTE DISPOSAL

Following classification, the waste in each container will be handled and disposed according to its classification, as described below. Additional sampling and analysis may be required for TSD facility acceptance at both hazardous and nonhazardous waste facilities. A Uniform Hazardous Waste Manifest shall be prepared for every hazardous waste shipment going off-station to an authorized disposal facility (Figure 6-4). The manifest shall be signed by an authorized representative of the MCAS El Toro Environmental Department. Waste classifications and disposal options are summarized in Figure 6-5.

California regulations relate waste classifications with classes of Waste Management Units. Designated wastes must be disposed in Class II or higher facilities. Nonhazardous solid wastes must be disposed in Class III or higher facilities. Petroleum hydrocarbon soils will be treated or disposed at facilities permitted to handle this waste. Inert wastes may be disposed in unclassified disposal facilities.

6.3.1 Hazardous Waste

Federal and California Land Disposal Restrictions (LDRs) are in effect for most hazardous wastes. Based on the results of hazardous waste testing, the LDRs will need to be identified for all contaminants that are considered hazardous. Due to the scope of LDRs, it is not practical at this time to identify LDRs for all potential contaminants that may be encountered. After LDRs have been determined, off-site facilities licensed to accept such waste will be identified; disposal options will be presented to the SWDIV Remedial Project Manager and Contracting Office; and transport will be arranged for disposal of this waste at the facility selected by the Navy.

6.3.2 Nonhazardous Waste

Nondesigned, nonhazardous solid waste shall either be transported to a Class II or Class III facility permitted to accept the material or used as cover material for one of the landfill sites at MCAS El Toro. In some cases, nonhazardous soils may be spread on the ground at the site of generation. This will be done only with regulatory and Navy approval. Nonhazardous wastewater shall be disposed through the GAC system or the base sanitary sewer system (after receiving authorization from the Navy).

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CHANGES

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CLEAN II
CTO-0059
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Section 6 Waste Handling and Disposal

EXISTING

6.3.3 Designated Waste

Waste soil (including drill cuttings) and debris that are classified as designated waste shall be transported to a disposal facility licensed to accept such wastes, either Class I or II facilities.

6.3.4 Petroleum Hydrocarbon-Contaminated Soil

Petroleum hydrocarbon-contaminated soil may be used in routine land applications if the concentrations of TPH are 100 mg/kg or less, as described in Section 3.3. Soil contaminated with higher concentrations of TPH will either be treated with an approved treatment system capable of treating to 100 mg/kg or taken off-site for disposal at a licensed facility. Treatment systems may be on-site or off-site and commonly involve thermal desorption or bioremediation. If the CRWQCB concurs, soil containing up to 1,000 mg/kg may be disposed at MCAS El Toro landfills.

6.3.5 Inert Waste

Inert waste will be spread at the source, if permitted. Otherwise, it will be disposed at a Class III disposal site.

6.3.6 Radioactive Waste

Off-site facilities licensed to accept radioactive wastes will be identified, and transport will be arranged for disposal of these wastes.

Section 6 Waste Handling and Disposal

CHANGES

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6.3.5 Inert Waste

Inert waste will be spread at the source, if permitted. Otherwise, it will be disposed at a Class III disposal site, or stored at the WSF if there is potential to use it as cap material.

6.3.6 Radioactive Waste

Off-site facilities licensed to accept radioactive wastes will be identified, and transport will be arranged for disposal of these wastes.

6.4 WASTE STORAGE FACILITY PROCEDURES

Soils stored at the WSF for eventual use as cap material or other small sites shall be maintained as separate piles. Each pile shall be ~~corresponding~~ ^{corresponding to} a bin used to collect the soil. ~~Labels shall be maintained~~ Each pile shall be labelled such that the soils can be traced back to analytical data that determined disposition, the source location of the soils, and the bin used to hold it. Piles shall be inspected weekly for compliance to this plan. The WSF shall have placarding limiting access to authorized personnel only. A Drawing will be maintained at the base documenting pile identification data, and locations.

FAR: IDW/059/0068
DI: 2/27/96
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of 3
AB
la sj la

REASON FOR CHANGE

5090
Ser 185C1/
February 14, 1996

Bechtel National, Inc.
401 West A Street, Suite 1000
San Diego, CA 92101

Subj: TECHNICAL DIRECTION - CONTRACT #N68711-92-D-4670, COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN), CTO NO. 0073 AND 0076, INVESTIGATION DERIVED WASTE FOR THE MARINE CORPS AIR STATION, EL TORO, CA

Technical direction regarding the subject guidance is provided herein.

This direction is provided pursuant to your letter dated December 15, 1995, and January 31, 1995 and all future request for requesting selection of a disposal location for disposition of Investigation Derived Waste (IDW) generated under the subject CTOs.

Your recommended option to store IDW temporarily at the base for use for landfill caps is acceptable.

One condition is that the CLEAN II Waste Management Plan (WMP) be modified to include IRP Site 5 as an IDW management area and to include procedures for inspection and security at IRP Site 5. The current WMP does not address waste management at IRP Site 5. The modified WMP is subjected to approval by the Station.

The technical direction issued to the Contractor in this letter has been determined by the Navy to be within the general statement of work issued under this CTO and does not constitute a change as described in Contract Clause FAR 52.243-2, "Changes - Cost Reimbursement (Alternate 1)". Further, this is not an authorization to incur costs in excess of the estimated cost set forth in the CTO.

You shall proceed promptly with the performance of work, including the above technical direction.

If, in your opinion, you consider this technical direction to be a change to the CTO, you shall not proceed with this direction, but shall notify the Contracting Officer, in writing, within three working days after receipt of this letter in accordance with Contract Clause FAR 52.243-7, "Notification of Changes" and Contract Clause entitled "Contracting Officer's Technical Representative, Technical Direction and Monitoring". No action