

4/95

RESPONSE TO COMMENTS
Draft Addendum to RCRA Facility Assessment Work Plan
MCAS El Toro, California

M60050.001480
 MCAS EL TORO
 SSIC # 5090.3

<p>Originator: Maj. Timothy J. Evans Counsel, MCAS El Toro</p> <p>To: Lee Christensen FMD, MCAS El Toro</p> <p>Subject: Investigation-Derived Waste Management Plan (IDWMP)</p> <p>Date: 6 March 1995</p>	<p align="right">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0065 File Code: 0306</p>
<p>GENERAL COMMENTS</p> <p>Section 3.2, California Hazardous Waste Criteria should include citations to the California Code of Regulations (CCR) Title 22. Since we are required to follow the analysis plan, the analysis section would reference specific regulations in Title 22 CCR.</p>	<p>RESPONSES TO GENERAL COMMENTS</p> <p>Response 1: CTO-0065 is attaching the Draft CTO-0059 IDWMP. This comment will be incorporated into the Final CTO-0059 IDWMP and the attachment to CTO-0065 will be amended to reflect these changes at that time.</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 Country 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 IDWMP. 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 2: See response to Comment 1.</p>
<p>Rewrite Paragraph 2, sentence 3 of Section 3.3 Petroleum Hydrocarbon-Contaminated Soil to reach "less than 1,000 milligrams per kilogram" versus "up to 1,000 milligrams per kilogram." This adds a little margin of safety.</p>	<p>Response 3: See response to Comment 1.</p>
<p>Rewrite sentence 3 of Section 5.3 Petroleum Hydrocarbon-Contaminated Soil to read " as described in Section 3.3" versus "as described in Section 3.3.1. There is no Section 3.3.1.</p>	<p>Response 4: See response to Comment 1.</p>
<p>Rewrite sentence 1 of Section 6.3.4 Petroleum Hydrocarbon-Contaminated Soil to read "as described in Section 3.3" versus "as described in Section 3.3.1. There is no Section 3.3.1.</p>	<p>Response 5: See response to Comment 1.</p>

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<p>Originator: John A. Garrison Safety Manager To: Mr. Parpriani AC/S Env. & Safety (Environmental Engineer) MCAS El Toro Subject: Addendum to the Work Plan Date: 2 March 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0065 File Code: 0306</p>
<p>GENERAL COMMENTS</p> <p>Comment 1: In a brief overall review of the document, I could find no mention of precautions for or consideration of minimization of hazards to government personnel who may be near any of the sites in the course of normal duties. This may be something which should be included.</p>	<p>RESPONSES TO GENERAL COMMENTS</p> <p>Response 1: The protocols to protect persons other than CLEAN II, or project-related personnel, are given in Section 19 of the programatic and site-specific Health and Safety Plan. Section 19 addresses site visitors and requirements for their protection. Base personnel not directly involved with CLEAN II work are considered visitors.</p>
<p>SPECIFIC COMMENTS</p> <p>Comment 1: <u>Site Maps</u> The site maps are difficult to interpret. Addition of a north arrow, inclusion of a landmark (building etc.) and descriptive text would enhance their quality. Without these features it will be difficult to locate boring holes in the future.</p>	<p>RESPONSES TO SPECIFIC COMMENTS</p> <p>Response 1: All figures have been revised from the "cut & paste" ones used in the draft Work Plan to electronic originals that meet CLEAN II standards for presentation.</p>
<p>Comment 2: <u>Figure 4-3</u> I am not sure where this location is but if it is at our fence line the following inaccuracies need to be resolved: (1) The channel is lined versus unlined. (2) There is a RCP storm drain along the northwesterly side of the channel. Size and location are readily observable in the field. The three proposed angle borings may have to be relocated to the other side of the channel to avoid this obstruction.</p>	<p>Response 2: The figure for SWMU 9 has been revised to show the channel as lined. Utility clearance has been performed to assure no penetration of existing structures. Proposed borings for this location are vertical and not angle borings.</p>

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<p>Originator: Tustin Planner To: Vish Parpriani MCAS El Toro Subject: Addendum to the Work Plan Date: 13 March 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0065 File Code: 0306</p>
<p>GENERAL COMMENTS</p>	<p>RESPONSES TO GENERAL COMMENTS</p>
<p>Comment 1: Separate all attachments with dividers, not just colored paper for quicker referencing.</p>	<p>Response 1: Comment is a good point; however, the current guidelines and cost-controls exercised by CLEAN II have not allowed for tabs or dividers in the reports and plans.</p>
<p>Comment 2: language when referring to the base is not appropriately written. Example, see pg. 1-2, sec. 1.2, line 2 "for the MCAS El Toro" should be written for "MCAS El Toro." This appears again on pg. 2-1, line 1.</p>	<p>Response 2: Text has been revised throughout the document to refer to the base as "MCAS El Toro".</p>
<p>Comment 3: <u>Page 2-2</u> Map needs to be turned around so as not to be printed landscape style. Cannot read sideways.</p>	<p>Response 3: Figure has been revised to a portrait orientation.</p>
<p>Comment 4: <u>Page 5-1</u> Third column needs to identify organization which these people work for. Phone numbers would be also helpful.</p>	<p>Response 4: The information requested is contained in the Health and Safety Plan, Attachment E.</p>
<p>Comment 5: <u>Page A6-3</u> The field sampling form shown on this page needs to be turned so title is under form not perpendicular.</p>	<p>Response 5: Figure has been revised to portrait orientation.</p>
<p>Comment 6: Coordination of execution schedule with tenants will be required in a timely manner prior to initiation of work. AC/S Environmental should be responsible party, not ROICC OR FMD.</p>	<p>Response 6: CTOL understands that the AC/S coordinator is a key person to the successful execution of coordinating activities with the tenants. A construction schedule will be submitted and updated regularly for the AC/S Environmental Coordinator</p>
<p>Comment 7: <u>Visitor Requirements, Page E19-1</u> All contractors will need to register vehicles with PMO in order to acquire window stickers. One list will need to be compiled of company vehicles, names of drivers, insurance coverage, etc.</p>	<p>Response 7: This comment has been communicated to the CLEAN II environmental coordinator for the site. The intent is to provide a complete list for several CTOs at the same time, and not simply on a CTO-by-CTO basis. This should reduce repetitive tasks.</p>

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<p>Originator: Bonnie Arthur Remedial Project Manager Federal Facilities Cleanup Office U.S. Environmental Protection Agency</p> <p>To: Joseph Joyce BRAC Environmental Coordinator MCAS El Toro</p> <p>Subject: Draft Addendum to the RFA Work Plan</p> <p>Date: 21 March 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0065 File Code: 0306</p>
<p>GENERAL COMMENTS</p> <p>Comment 1: The following issues should be discussed in a conference call or meeting:</p> <ul style="list-style-type: none"> • The collection of opportunity samples, including criteria, purpose and sample collection methods. • SWMU-specific discussions indicate that “additional samples will be collected until sufficient data exist to make a recommendation.” It is imperative that the Navy and regulators agree with the objectives of the proposed sampling to avoid further field efforts at a later date. • The percentage of samples sent off-site for confirmation analyses. • The approach for Group 1 and 2 Temporary Accumulation Areas (TAAs). 	<p>RESPONSES TO GENERAL COMMENTS</p> <p>Response 1:</p> <ul style="list-style-type: none"> • Opportunity samples have been eliminated from the scope of activities. • “Sufficient data” is defined in the decision rules and SWMU-specific discussions of the FSP. • The percentages were discussed during meetings in the BNI office 4/24-25/95 with Dante Tedaldi and members of the BCT. The percentages for offsite analysis are presented in Section 1.1.1 of the FSP. • The Approach for Group 1 and Group 2 TAAs is essentially the same. The only critical factor is to report any potential for release at the group 1 TAAs to the DTSC within 30 days so that the site can be assigned a SWMU designation. The CTOL has been in contact with Juan Jimenez on this issue.
<p>Comment 2: Inconsistencies in the approach towards field screening for inorganics should be corrected.</p>	<p>Response 2: Text has been revised to reflect the reviewer’s comments.</p>
<p>Comment 3: Discussions regarding the use of immunoassay kits should be site specific and data from prior investigations should support the use of these kits in terms of the appropriateness of the indicator analytes and their detection limits.</p>	<p>Response 3: Text has been revised to reflect the reviewer’s comments. The discussion of individual SWMUs in Section 4 of the FSP addresses this concern.</p>
<p>Comment 4: The workplan and attachments contain inaccuracies regarding the elements of the US EPA Contract Laboratory Program (CLP).</p>	<p>Response 4: Text has been revised to reflect the reviewer’s comments. Analytical sections have been coordinated and reviewed with the CLEAN II laboratory contacts and has been revised for accuracy.</p>

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<p>SPECIFIC COMMENTS</p> <p>Comment 1: <u>Page 1-2, Para 5.6</u> The correct reference is the prime contractor, Jacobs Engineering Group, instead of CH₂MHill.</p>	<p>RESPONSES TO SPECIFIC COMMENTS</p> <p>Response 1: Text has been revised to reflect the reviewer's comments.</p>
<p>Comment 2: <u>Page 1-2, Para 6</u> BCP stands for BRAC Cleanup Plan, not Base Closure Plan.</p>	<p>Response 2: Text has been revised to reflect the reviewer's comments.</p>
<p>Comment 3: <u>Page 1-3, Para 2</u> the opportunity samples do not appear to represent a viable means for the evaluation of potential contamination. For example, steam blasting to collect an aqueous sample of SVOCs from a solid surface is not recommended.</p>	<p>Response 3: Opportunity sampling has been eliminated from the Work Plan.</p>
<p>Comment 4: <u>Page 1-3, last Para</u> The WPA will not address all previously submitted DTSC comments on the RFA. What are the comments that are addressed and when will the others be addressed? When will a comment resolution document be prepared?</p>	<p>Response 4: The Work Plan proposes that this be addressed in the final RFA addendum report. The comment and response document that accompanies the final report will include a comment/response section on the original comments (Zarnoch 1994a b; Arellano 1994a b).</p>
<p>Comment 5: <u>Page 1-5, Table 1-1</u> Please use the definitive unit, e.g., mg/kg or mg/L.</p>	<p>Response 5: Text has been revised to reflect the reviewer's comments.</p>
<p>Comment 6: <u>Page 1-5, Table 1-1</u> Please use the term CRDL correctly here and throughout the report. CRDL stands for Contract Required Detection Limit and is applicable only to CLP analyses for inorganics. CRQL represents Contract Required Quantitation Limits and is applicable only to CLP analyses for</p>	<p>Response 6: The term "CRDL" was used in the final RFA report (JEG 1993) and is used here as a reference to that work. The final RFA addendum report will reflect reviewers' comment.</p>

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<p>organics.</p>	
<p>Comment 7: <u>Page 1-5, Table 1-1</u> Do not include laboratory data qualifiers, e.g. J, without an appropriate explanation as a footnote.</p>	<p>Response 7: The qualifier "J", among others, was used in the final RFA report (JEG 1993) and is used here as a reference to that work. The final RFA addendum report will reflect reviewers' comment.</p>
<p>Comment 8: <u>Page 1-5, Table 1-1</u> Do not use the term action level for TPH without including rationale for use and numerical value.</p>	<p>Response 8: The references to action levels have been revised to include a reference as a basis for definition of the action level.</p>
<p>Comment 9: <u>Page 1-6, Table 1-1</u> For AOC 264, rephrase and clarify the statement "Additional sampling has been conducted and (sic) analyzed." If so, where is the review and interpretation of these data?</p>	<p>Response 9: The additional sampling and interpretation was conducted by MCAS El Toro AC/S Environmental group and the reference given documents that work. [The correct spelling is "analyzed" according to Webster's New World Dictionary.]</p>
<p>Comment 10: <u>Page 3-2, Table 3-1</u> The statistical concept of confidence is different than that of probability and therefore, the terms should never be used interchangeably as they are in this table. Based on the hot spot presentation in the text, the correct term for this table is probability, not confidence.</p>	<p>Response 10: Text has been revised to reflect the reviewer's comment.</p>
<p>Comment 11: <u>Page 3-5, Para 3</u> When referring to types of analyses be definitive. Do not simply state screening or (sic) off-site. State field screening or off-site analyses.</p>	<p>Response 11: Text has been revised to reflect the reviewer's comment.</p>
<p>Comment 12: <u>Page 3-5, Para 4</u> Provide support for the assumption that two samples from geotechnical analyses are adequate based on the apparent differences between AOCs and VMUs.</p>	<p>Response 12: In defining the inputs required to make a decision for each SWMU, the only sites that may require geotechnical sampling are those with some potential excavation of many yards of soils. This was assumed to be SWMUs 9 and 46, based on present information. Geotechnical samples are</p>

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	<p>more useful for remedial rather than assessment tasks, but the opportunity to collect them now is a cost-savings and good background information for the El Toro program as a whole, not just CTO-0065.</p>
<p>Comment 13: <u>Page 3-5</u> Provide a base map/figure which identifies the locations of the 11 AOCs/SWMUs to be sampled using this effort.</p>	<p>Response 13: Text has been revised to reflect the reviewer's comment.</p>
<p>Comment 14: <u>Page 3-6</u> After the first mention of "opportunity" sampling, remove the quotes.</p>	<p>Response 14: Opportunity sampling has been eliminated from the Work Plan.</p>
<p>Comment 15: <u>Page 3-6</u> The purpose of the opportunity sampling is "...to support the reevaluation of the decontamination/removal strategy.." Explain how these samples will be used for this purpose because apparently they will only indicate the resultant concentration of contaminants in decon water, but not of the original material. Also, the stated purpose does not appear to agree with the data usage specified on page 1-3, end of 2nd paragraph.</p>	<p>Response 15: Opportunity sampling has been eliminated from the Work Plan.</p>
<p>Comment 16: <u>Page 3-6, last Para</u> The discussion does not specify how confirmation will be assessed. This missing information is critical to an evaluation of the acceptability of this approach.</p>	<p>Response 16: No procedure for confirmation is specified due to the nature of soil matrix data. The CTOL will use the available expertise on CLEAN II and in the SWDIV to evaluate the data when it is validated. If screening data is determined to be out of agreement, however that is defined - and documented in the final report - , then the final recommendation will be based on the off-site analytical data only. Text has been revised to indicate this response to reviewer's comment.</p>
<p>Comment 17: <u>Page 3-6, last Para</u> TC' stands for Target Compound List, not total compound list. TAL</p>	<p>Response 17: Text has been revised to reflect the reviewer's comment.</p>

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<p>Comment 23: <u>Page A4-1</u> Category 1 sites: Do Category 1 sites have a confirmed release? Please clarify "systemic sampling."</p>	<p>Response 23: "Systematic sampling" is a grid-based, rather than judgmentally-based, sampling approach, such as the "hot spot" methodology used in this plan. Systematic is used as the descriptor as opposed to biased or random.</p> <p>Category 1's do not have a confirmed release, but they do have sufficient indication of contaminants below PRGs to merit additional assessment.</p>
<p>Comment 24: <u>Page A4-1</u> Also, typographical error for Category 2 SWMUs ("a or").</p>	<p>Response 24: Text has been revised to reflect the reviewer's comments.</p>
<p>Comment 25: <u>Page A4-1</u> Please indicate if "access to sampling sites" is currently a problem, or is this just included as a planning contingency?</p>	<p>Response 25: Included as a planning contingency, and rationale for funding certain activities. In some cases access has been limited due to vehicles parked over sample locations or utilities being present at the site.</p>
<p>Comment 26: <u>Page A4-3</u> Provide a one page summary table of the DQOs for all AOCs/SWMUs.</p>	<p>Response 26: Text was not revised to reflect the reviewer's comment. Current revisions to the text on discussing DQOs in the FSP are brief enough that there is no need to summarize.</p>
<p>Comment 27: <u>Page A4-3, Para 1, last sentence</u> Delete the last sentence. The figure referenced does not mention a 10 foot diameter hot spot, nor is a 10 foot hot spot approach consistently applied for all DQOs at all SWMUs/AOCs.</p>	<p>Response 27: Text has been revised to reflect the reviewer's comments.</p>
<p>Comment 28: <u>Page A4-3, last Para and following pages</u> Considerable confusion can result from the interchange of the expressions TFH and PHC and PAHs. Be definitive about what is being examined and measured. Do the authors believe that the PHC test kit is adequate for the assessment of PAHs and TPH or TFH?</p>	<p>Response 28: Text has been revised to reflect the reviewer's comment. The PETRO kit is described as a petroleum fuels screening kit. The PAH kit screens for two- through six-ring aromatic compounds, so there is some overlap.</p>

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<p>Comment 29: <u>Page A4-3</u> SWMU 7 Clarify if other stained locations, other than that near Boring 007H1 have been observed. Additionally, clarify if any samples will be analyzed using Method 624-M TCL/SOW. SWMU 9 As discussed in General Comments, the appropriateness of the immunoassay kits is dependent upon the contaminants expected and their detection limits. As noted in General Comments, EPA would like to clarify the phrase, "sufficient data exist to make a recommendation."</p>	<p>Response 29: Method 624-M was an erroneous reference on the author's part. Text has been revised to reflect the most appropriate analyses for each SWMU.</p> <p>Comments are noted.</p>
<p>Comment 30: <u>Page A4-6</u> SWMU 39 Recommend that samples are collected at two locations near Boring 39A1. SWMU 88 Recommend that samples are collected at two locations near Boring 88A2.</p>	<p>Response 30: There is no reason to expand assessment activities if contaminants have not been detected above action levels defined in the Work Plan. The original Work Plan proposed locations and they were approved. If the soils at these approved locations are determined to be below PRGs or LUFT action levels, then the recommendation for no further action is justified, per the original Work Plan, as well as this addendum to the Work Plan.</p>
<p>Comment 31: <u>Page A4-10</u> SWMU 131 and 244 Provide summary of RFA data. Give date of actual sampling and contaminant levels. SWMU 171 Please provide a description of the sump and summary of any sampling results, if available.</p>	<p>Response 31: The requested information is already a part of the final RFA report.</p>
<p>Comment 32: <u>Page A4-10, last Para, second to last sentence</u> Correct the erroneous sentence. Statistically, only one sample may be required to provide a 95-percent probability of detecting a release. A minimum of three locations is not necessary. In this application, the number of samples are a function of confidence, not probability.</p>	<p>Response 32: Text was originally provided to the author by BNI's statistician; however, it has been revised at the request of the reviewer.</p>

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<p>Comment 33: <u>Page A4-17, Para 1</u> The description of field screening for inorganics is inconsistent with the discussion in the QAPP. The QAPP states that ion-selective electrodes may be used in addition of XRF.</p>	<p>Response 33: Text has been revised to eliminate discussion of inorganic screening by any means other than XRF.</p>
<p>Comment 34: <u>Page A4-19</u> When will the map be provided?</p>	<p>Response 34: Final figures and maps are provided in the final Work Plan Addendum.</p>
<p>Comment 35: <u>Page A4-21</u> See Comment Number 15.</p>	<p>Response 35: Opportunity sampling has been eliminated from the field activities.</p>
<p>Comment 36: <u>Page A5-1</u> The methods listed are inconsistent for soil and water and applicable methods for each medium should be listed.</p>	<p>Response 36: The CLEAN II laboratory coordinator for El Toro CTOs has reviewed the method discussion sections and text is now revised for accuracy and consistency.</p>
<p>Comment 37: <u>Page A5-1, last Para</u> The CLEAN II Program does not require that laboratory subcontractors be participants in the USEPA contract laboratory program. However, all CLEAN II Program laboratories are capable of providing CLP-equivalent data reporting packages and implementing CLP analytical statements of work.</p>	<p>Response 37: The reviewer's statement is an excellent clarification of the author's intentions in the text.</p>
<p>Comment 38: <u>Page A5-2</u> Include an explanation of the nomenclature for the Sample Numbering System.</p>	<p>Response 38: Sample numbering was per an older version of SOP T2.2. Since the draft was submitted, a new version has been issued and the sample numbering has been revised.</p>

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<p>Comment 39: <u>Page A5-4</u> Replace “Only if needed or DTSC insists.” with “If required or requested by DTSC or other regulatory agencies.”</p>	<p>Response 39: Text has been revised to eliminate the text (and scope of work) in question.</p>
<p>Comment 40: <u>Page A6-1</u> It is confusing to use the terms “Relevant and appropriate” for the applicability of the Standard Operating Procedures.</p>	<p>Response 40: The phrase is used in that certain portions of an SOP are neither relevant (e.g., the section of sample handling pertaining to groundwater) nor appropriate (Decontamination procedures as written do not include the use of HPLC water).</p>
<p>Comment 41: <u>Page A6-1</u> Ongoing discussions between EPA and DTSC representatives have been occurring to resolve the issue of Bechtel’s SOPs. Until the issue is resolved, include sufficient description of each referenced SOP. Additionally, the total number of SOPs identified in this section (four SOPs) does not correspond to those listed on page B6-3 (seven SOPs).</p>	<p>Response 41: Consistency of reference is resolved. The issue of SOPs is resolved with DTSC in that DTSC has a copy and future FSPs and WPs will attach all referenced SOPs. CTO-0065 was not instructed to do so.</p>
<p>Comment 42: <u>Page A6-2, Para 3</u> The text states that achievement of DQOs can be documented for each sample through the review of the SSSF. Based on the content of the SSSF, the attainment of this objective is impossible. It is suggested that the SSSF be modified to include a table listing the sample ID and the cross-referenced DQOs.</p>	<p>Response 42: “Documentation of DQOs for each sample” was an over-enthusiastic claim for what is to be a data quality analysis tool. The SSSF form will document additional information not contained or available from validation flags or lab comments alone. Once the SSSF is in use, it will most definitely be modified from it’s current format, which is based on another BNI project</p>
<p>Comment 43: <u>Page A6-2, Para 4</u> See Comment Number 19.</p>	<p>Response 43: Text has been revised to reflect the reviewer’s comments.</p>
<p>ATTACHMENT B Comment 44: <u>Page B3-2, Para 2</u></p>	<p>Response 44: Text in Table 3-1 has been revised to refer to the method detection limit. There is no mention of a “maximum”.</p>

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<p>There is no “..maximum detection level..” identified for any of the field screening nor any of the off-site analytical methods. It appears that the authors are referring to detection limits in Table 3-1; however, sample dilutions would increase the detection limit for off-site analytical methods, not decrease the detection limit.</p>	
<p>Comment 45: <u>Page B3-3</u> It is unclear if the “Project Required Detection Limits” are equivalent to the listed “Detection Limit(s).” It appears that the listed “Detection Limit(s)” are the expected achievable limits of each method, not what may be required based on regulatory criteria.</p>	<p>Response 45: See response 42.</p>
<p>Comment 46: <u>Page B3-9, Para 1</u> There are two errors in the text which states that 10 percent positives and 5 percent nondetects will be sent to a CLP laboratory for analyses. First, see Comment Number 37 regarding use of the terminology CLP laboratory. Second, on page 3-7 the text states that 15 percent positives and 10 percent nondetects will be sent to an off-site laboratory for confirmation.</p>	<p>Response 46: Decision rules for the quantity of confirmation samples is given in Section 1.1.1 of the FSP. There are no other conflicting statements on the subject. The text has been revised to reflect the reviewer’s comments.</p>
<p>Comment 47: <u>Page B3-9, last Para</u> The text states that XRF or ICP and ion selective electrodes will be used for field screening of inorganics. However, nowhere in the preceding discussions of inorganic field screening was the use of ICP mentioned. A review of the text which follows on the next page indicates that ICP will not be used in the field, rather it will be used for off-site fixed laboratory confirmation analyses (see page B3-10, 1st and 2nd paragraphs).</p>	<p>Response 47: The discussion on ICP was a carry-over from previous QAPP document files and has no bearing on CTO-0065 activities. Text has been revised for consistency.</p>

RESPONSE TO COMMENTS
Draft Addendum to RCRA Facility Assessment Work Plan
MCAS El Toro, California

<p>Originator: Bonnie Arthur Remedial Project Manager Federal Facilities Cleanup Office U.S. Environmental Protection Agency</p> <p>To: Joseph Joyce BRAC Environmental Coordinator MCAS El Toro</p> <p>Subject: Draft Addendum to the RFA Work Plan</p> <p>Date: 21 March 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0065 File Code: 0306</p>
<p>Comment 48: <u>Page B3-11, Para 2</u> 2nd paragraph conflicts with text on page A5-1 regarding the requirement to use CLP methods if using NEESA Level D analyses.</p>	<p>Response 48: Text has been revised to reflect the reviewer's comments.</p>
<p>Comment 49: <u>Page B3-13, Table 3-3</u> For the parameter pH, correct the entry "pH<screening" and delete "Immunoassay." Also, there are no specified RPD and %R values for pH measurement.</p>	<p>Response 49: The point is mute since there will be no environmental water samples collected, hence no field measurement for pH. The pH of HPLC QA/QC samples will be verified using pH paper strip tests.</p>

RESPONSE TO COMMENTS
Draft Addendum to RCRA Facility Assessment Work Plan
MCAS El Toro, California

<p>Originator: Sherrill Beard/Karen Thomas Baker Biological Support Unit Long Beach, California 90802</p> <p>To: Juan Jimenez Office of Military Facilities Long Beach, California</p> <p>Subject: Draft Addendum to the RFA Work Plan</p> <p>Date: 23 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>GENERAL COMMENTS</p> <p>Comment 1: Provide a signature page signed and stamped by a California Registered Geologist or a Professional Civil Engineer at the beginning of all future submittals that include information and interpretation regarding geology, hydrogeology, and vadose zone investigations.</p>	<p>GENERAL RESPONSES</p> <p>Comment 1: Comment is noted. As this is a plan and does not contain interpretation of geological, to, or vadose zone data, the signature of an R.G. is not required. Final reports will comply with the requirement.</p>
<p>Comment 2: Conduct a general internal review before submittal of any future documents. Reconcile all discrepancies within the Addendum.</p>	<p>Response 2: Comment is noted. Text has been reviewed and revised for consistency within and between the documents.</p>
<p>Comment 3 Provide an Executive Summary. Document the events that led to the Addendum, include an explanation why RCRA terminology is used but technically the Addendum is not a RCRA document. Also explain why the scope of the Addendum has changed from the original Final RCRA RFA (JEG, 1993).</p>	<p>Response 3: A summary is provided at the front of the Work Plan. The historical review section of the plan discusses the circumstances for this CTO-0065 being labeled an RFA. The scope has not changed from the final RFA document. The scope is still to assess SWMUs and move them to NFA, or remedial action. All but eight of the TAAs are SWMUs previously addressed in the final RFA report.</p>
<p>Comment 4: In Section 1.4 - Objectives - it is stated "SWMUs and AOCs requiring additional assessment by the DTSC involving storage tanks or oil/water separators will be addressed under different CTOs. Therefore, the activities proposed in the WPA will not address all of the DTSC comments on the RFA report (CH₂M Hill, 1993) and additional work will be required."</p> <p>Provide information regarding the CTO which the storage tanks and oil/water separators will be addressed. Also, provide a list highlighting DTSC comments that were incorporated into the Addendum.</p>	<p>Response 4: The oil/water separators and tanks to be addressed separately from this CTO are currently undergoing response actions through the El Toro A/CS Environmental Group. According to CTO-0065 RPM Jason Ashman, the "activity", or MCAS El Toro, is treating these units as a facility problem and the on-base A/CS Environmental department is performing the requested assessments.</p> <p>DTSC comments and the responses to them will be incorporated and documented into the CTO-0065 final plan.</p>
<p>Comment 5: In the future, provide all previous DTSC comments and Navy responses or identify the nature and location of changes in the final document. The Addendum does not clearly outline changes from the Final</p>	<p>Response 5: Comment is noted.</p>

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<p>RCRA RFA (CH2MHill, 1993).</p>	
<p>Comment 6: A SWMU/AOC or TAA where contamination is verified will be addressed either under the Remedial Investigation/Feasibility Study (RI/FS) program or a removal action program such as an Engineering Evaluation/Cost Analysis (EE/CA).</p>	<p>Response 6: Text is in agreement with the comment.</p>
<p>Comment 7: Section 3.2.3.1 - Geological Investigation and Geotechnical Sampling - Although it is not stated, it is assumed by GSU that all borings will be logged.</p> <p>Notify DTSC if this assumption is incorrect.</p>	<p>Response 7: The draft document stated that field boring logs and description of samples will be performed in the FSP section discussing geotechnical and geological sampling.</p>
<p>Comment 8: <u>Temporary Accumulation Areas</u> Discuss an approach to eliminate the TAAs from the RFA listing, when appropriate. For example, concrete pad TAAs could be decontaminated by bead blasting then the concrete sampled using a wipe test.</p> <p>In Section 4.2.1 the sampling method is described “If stains or discoloration are observed, a screening sample may be taken by using a steam cleaner or by scrubbing and collecting the resulting fluid to analyze for SVOCs/PCBs/pesticides/metals.” This sampling technique is not acceptable.</p> <p>Section 3.2.3.4 Opportunity Sampling, describe in more detail the definition of Opportunity Sampling and the field methods for sample collection.</p> <p><u>It is strongly suggested that the methods of characterization and determination of No Further Action (NFA) for the TAAs should be further discussed in a technical meeting.</u></p>	<p>Response 8: The TAAs all have SWMU numbers with the exception of those designated as group 1 (Table 1-2 in the WP). Therefore, the remaining TAAs are addressed previously in the final RFA report or will be addressed in the CTO-0065 addendum final report. The remaining TAAs will be addressed in the Addendum final report to the extent possible. The scope is to evaluate removal strategies, not to design a removal action.</p> <p>The opportunity sampling strategy has been eliminated from the plan.</p> <p>Meetings were held with representatives of the DTSC at El Toro to review technical issues involving screening techniques and recommending no further action on 3/11/95 and 3/27/95.</p>

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<p>Comment 9: Excavation have occurred at SWMU 9 (Fuel Bladder East of Aqua Chinon) and at SWMU 264 (DRMO Storage Yard #3). Re-evaluate sampling locations and depths.</p>	<p>Response 9: Text has been revised to direct that depth of samples be referenced to below original ground surface at the SWMU 9 location. SWMU is recommended for no further action.</p>
<p>Comment 10: There are about ten additional TAAs in the Addendum as compared to the Final RFA Report (CH₂MHill, 1993). Please provide an explanation for this discrepancy.</p>	<p>Response 10: The additional eight TAAs are from the BRAC Closure Plan listing of TAAs. These TAAs do not have SWMU numbers and so were not addressed in the CLEAN I RFA activities.</p>
<p>Comment 11: Detection limits for field screen analysis, especially for PCBs, PAHs and SVOCs must be evaluated by the BCT. There may be an enhanced probability in identifying contamination using screening techniques because of the increased number of samples collected and analyzed. This may outweigh the fact that some of the field screening immunoassay kits can not produce detection limits and/or health-based values achieved by off-site laboratories, however, the BCT should fully understand the limitations of these field techniques and be in agreement regarding this issue.</p> <p>An example is the immunoassay kit used for PCBs. The addendum recommends using the immunoassay kit for aroclor 1260. The immunoassay kit detection limit criteria (0.4 ppm) should not be limited to aroclor 1260. The detection limits for other aroclors are higher than 0.4 ppm and the detection of any aroclor poses a potential problem Both residential the industrial PRGs are less than the detentions limits listed in the Quality Assurance Project Plan (QAPP). (Table 3-1). Because the detection limits are more than the health-based threshold criteria it is recommended that the Navy propose an approach to interpret the non-detect results.</p> <p><u>This subject should be listed as a high priority at a technical meeting because not only are immunoassay kits being proposed for the work</u></p>	<p>Response 11: The issue of detection limits and screening techniques has been discussed at length between the CTOL, the DTSC, and the BCT (most recently at CTO-0059 meetings in San Diego held 4/24/95). The revised text that discusses the appropriate use of field screening techniques with respect to the method detection limits addresses the reviewer's comments.</p>

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<p><u>resulting from the Addendum but it has been discussed at several RPM meetings that this field technique will be implemented during the RI/FS Phase II field activities.</u></p>	
<p>Comment 12: Section 3.2.3.2 - Off-Site Analysis - This section states that “some or all” of the various suites of constituents will be submitted to off-site laboratories.</p> <p>Provide an explanation as to the rationale for deciding when “some or all” of the chemical suites will be sent to off-site laboratories.</p>	<p>Response 12: The text has been revised to state decision rules for the quantity of samples to be sent for off-site analyses. See FSP Section 1.1.1.</p>
<p>Comment 13: Field Sampling Plan (FSP)</p> <p>A. Section 5, Request for Analysis, Page A5-1, last paragraph - It is stated “Because this FSP covers activities required to close an RFA, rather than CERCLA activities, there will be no submission of off-site analytical samples to the U.S. EPA Contract Laboratory Program (CPL) analytical services.” It is recommended that this issue be discussed and agreed upon the BCT.</p> <p>B. Ensure that at least one off-site confirmation sample is collected from each SWMU/AOC.</p>	<p>Response 13: The text has been revised to more clearly state that CLP methods or equivalents will be used to perform confirmation analyses. the intent of the statement in the draft was that samples would not be submitted through EPA and the CLP program, but that CLP-equivalent methods would be used.</p>
<p>Comment 14: QAPP- Provide the comparable PRGs in Table 3-1.</p>	<p>Response 14: Text has been revised to reflect the reviewer’s comment.</p>

RESPONSE TO COMMENTS
Draft Addendum to RCRA Facility Assessment Work Plan
MCAS El Toro, California

<p>Originator: Jan Corbet Code 1852.JC</p> <p>To: Jason Ashman, RPM Southwest Division Naval Facilities Engineering Command</p> <p>Subject: CTO-0065 Site-specific Health & Safety Plan</p> <p>Date: 21 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>GENERAL COMMENTS</p> <p>a. The draft Site Health and Safety Plan (SHSP) adequately addresses the major requirements of references (a) and (c).</p> <p>b. All tables and figures must be complete in the final plan.</p>	<p>GENERAL RESPONSES</p> <p>Response a:</p> <p>No response.</p> <p>Response b. Certain pieces of information in the tables such as names and phone numbers of subcontractors are not known until a few weeks before mobilization. In order to issue the final plan on time, the tables will be re-issued under a cover letter and distributed at the onsite kick-off meeting and site-specific training prior to commencement of field activities.</p>
<p>SPECIFIC COMMENTS</p> <p>a: <u>Page E-5-1, Section 5.2.1</u> Please refer to appropriate SOP in this section.</p>	<p>SPECIFIC RESPONSES</p> <p>Response a: Text has been revised to refer to the appropriate SOP.</p>
<p>b: <u>Page E6-2, Section 6.6</u> This section refers to RS/FS field activities. I believe this is a RCRA Facility Assessment. This should be changed globally in the document.</p>	<p>Response b: Reviewer is correct. In response to SWDIV's award document direction that states ". . . H/S Plan shall be utilized to the maximum extent possible", the CTO-0059 H/S plan was used to generate the CTO-0065 H/S Plan. Some vestigial references to "RI/FS" activities remained, but that has now been revised to refer to the addendum RFA activities of CTO-0065.</p>
<p>c: <u>Page E8-1, Section 8.3, last paragraph</u> Clarify how vehicle wheels will be decontaminated.</p>	<p>Response c: The test has been revised to state that gross contamination shall be removed with such tools as sponges or wipes. This may not be specific enough of a clarification, however the actual circumstances of a "release" requiring wheels to be decontaminated can be so varied, that in the author's experience it is better to have a performance-based plan —i.e., decontaminate the wheels; how you do it is up to you in the field at that time—rather than a prescriptive plan that limits the responses available to the persons on the scene.</p> <p>Actual decontamination procedures can range from using soap and paper towels to remove an isolated amount of contaminant on one tire to the other</p>

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	<p>extreme of driving the vehicle onto a temporary decon pad at the scene and performing a thorough decon on site.</p>
<p>d: <u>Page E8-3, Section 8.9.1</u> Assure waste does not remain on site greater than 90 days.</p>	<p>Response d: This issue is addressed in the current revisions to the CLEAN II programmatic Investigation-Derived Waste Management Plan. The waste subcontractor and BNI have developed procedures that will assure waste does not remain on site for greater than 90 days.</p>
<p>e: <u>Page E16-2, Section 16-8</u> Clarify the air horn signal that will be used for emergencies (i.e., one blast).</p>	<p>Response e: Text has been revised to specify that the air horn blast will be one long blast.</p>

RESPONSE TO COMMENTS
Draft Addendum to RCRA Facility Assessment Work Plan
MCAS El Toro, California

<p>Originator: Virginia Garelick Remedial Technical Manager</p> <p>To: Jason Ashman RPM Southern Division San Diego, California</p> <p>Subject: Technical Review of Draft Addendum to RCRA Facility Assessment (RFA) Work Plan, MCAS El Toro</p> <p>Date: 18 April 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>GENERAL COMMENTS</p> <p>a. In 1991-1992, a RCRA Facility Assessment (RFA) was conducted at MCAS El Toro. The objective of the RFA was to identify and gather information on releases or potential releases at MCAS El Toro, to evaluate solid waste management units (SWMUs) and other areas of concern (AOCs) with respect to releases of hazardous wastes or hazardous waste constituents to the environment, and to assess the need for further action at the SWMUs/AOCs. An additional objective of the RFA was to identify potential sites for the RI/FS program at MCAS El Toro.</p> <p>In July, 1993, DON issued a final RFA report for the station. The report summarized the environmental sampling activities and the analytical results for the RFA. In May, 1994 the Department of Toxic Substances Control (DTSC) approved the final RFA report, contingent on several modifications. The primary goal of the subject document is to respond to DTSC's concerns and to make the necessary modifications to the final report. The subject document does <u>not</u> address DTSC's concerns regarding oil/water separators and USTs; apparently they will be addressed under other CTOs. Please confirm that these sites are being addressed.</p>	<p>GENERAL RESPONSES</p> <p>Response a: It is the CTOL's understanding from verbal communication with the RPM and the MCAS El Toro A/CS Environmental Coordinator that the sites not addressed by the CTO-0065 RFA are being addressed by the A/CS Environmental group as a facility-lead activity.</p>
<p>b. The objectives stated on page 1-3 need to be clarified. Please explain how sites will be addressed if contamination is found. Will the sites be moved into the RI/FS program? Will the sites be moved to the RAC? Please note that limited site characterization may be performed by the RAC as long as it is incidental to the removal/remedial action.</p>	<p>Response b: Text has been revised to specify that the field screening will continue to assess a detected release for up to ten working days, if necessary, in order to collect sufficient information to recommend the site be moved to the RAC. Moving a site to the RI/FS program is to be avoided unless assessing the site would exhaust the resources of CTO-0065. It is understood that RAC contractors can and should perform confirmation sampling.</p>

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<p>c. The information presented in Table 1-1 of the Work Plan (Summary of SWMUs/AOCs Requiring Confirmation Sampling), Table 3-1 of the Work Plan (Summary of Sampling Rationale and Proposed Activities), Table 1-1 of the FSP (Summary of Field Sampling Activities), and Data Quality Objectives and Sampling Strategies for the majority of the SWMUs/AOCs is not consistent.</p> <p>For example, for SWMU 9 (Fuel Bladder area), Table 3-1 (work plan) proposes collecting soil samples from 8 and 10 feet depths followed by additional soil samples collected at 8, 12, and 20 foot depths at 3 locations (if field screening indicates levels of diesel are above 750 ppm); Table 1-1 (FSP) proposes additional soil sampling below 5 feet to 30 feet, and the DQOs/sampling strategy proposes collecting three soils samples using “the systematic screening sampling approach” (no depth provided), followed by additional soil samples collected at 2, 5, and 7 foot depths. Please ensure that the information presented in the Workplan and the associated reports is consistent.</p>	<p>Response c: Text has been reviewed and revised for consistency.</p>
<p>d; The subject document addressed environmental sampling to assess or confirm contamination at 14 RFA sites (including 3 temporary accumulation areas). The workplan included the following: field sampling plan, quality assurance project plan, data management plan, investigation-derived waste management plan, and health and safety plan. Comments on the health and safety plan have been provided in a separate technical memorandum.</p>	<p>Response d: Comments noted.</p>
<p>e. Page 1-5 (Table 3-1 of Work Plan), Page 3-3 (Table 3-1 of Work Plan), Page A1-2 (Table 1-1 of FSP) and Page A4-6 of FSP (DQOs/Sampling Strategy for Site 39 - Active Hazardous Waste Storage Area); According to the Final RFA Report (ref. D) aroclor was observed (52</p>	<p>Response d: Text has been revised to address the presence of PCBs as well as the SVOCs.</p>

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<p>ppb) at a depth of 10 feet in an angle boring. The RFA addendum proposes to screen for SVOCs only. Recommend that the soil also be screened for PCBs.</p>	
<p><i>SPECIFIC COMMENTS</i></p> <p>a: <u>Draft RFA Work Plan Addendum</u> (i) Page 1-3, second paragraph. Please briefly discuss the work proposed to assess the condition of the temporary accumulation areas.</p>	<p><i>RESPONSES TO SPECIFIC COMMENTS</i></p> <p>Response a (I): The text discusses the use of an evaluation form as a surveillance checklist. That is the sum scope of the evaluation. The final report will summarize the results of the optional recommendations on the evaluation form.</p>
<p>(ii) Table 3-1 - Summary of Sampling Rationale and Proposed Activities: SWMU 88 —Drum Storage Area: Sampling is recommended at depths of 2, 5, and 8 feet. Recommend sampling to a depth of 10 feet to confirm the presence of PCBs. (Previous sampling at this depth indicated PCBs at 11 ppb (J)).</p>	<p>Response to a (ii): A sample is not proposed at 10 ft. since:</p> <ul style="list-style-type: none"> a. There is already valid, if estimated, data at that depth showing PCBs below PRGs, b. the screening kits will not be able to detect PCBs on the order of 10 µg/kg, and c. an offsite sample at 10 ft. may conflict with the current data. <p>These samples could be accommodated in the field and any revision to the FSP documented during field activities, if necessary.</p>
<p>b: Field Sampling Plan (i) Table 1-1 — Summary of Field Sampling Activities; Recommend rewriting the proposed section for SWMU 267 (Drop Tank Fuel Storage Area). The current description does not sufficiently explain the number/depth of samples to be collected.</p>	<p>Response to b (I): Based on site visits with the DTSC and the RPM and RTM, SWMU 267 is now recommended for no further action, in accordance with the final RFA report.</p>
<p>(ii) Page A1-7, Off-Site Laboratory Analysis Objectives: The FSP states “the sampling program will collect sufficient samples to have a 95-percent probability of detecting releases on the order of 9 feet in diameter.” Please briefly explain how you intend to establish the 95% probability. Methodology? What is the source for the measure of</p>	<p>Response to b (ii): The 95-percent probability is based on use of the hot-spot methodology. According to the method, the 9 foot-diameter release size is derived from the 15-foot grid node spacing. These figures were supplied to the CTOL from BNI’s statistician. The release diameter is assumed static, or at least assumed as nearly 9 foot in diameter at the time of release; no dispersion</p>

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<p>dispersion? How many samples are anticipated to arrive at a 95% probability?</p>	<p>factor was taken into account. With respect to the number of samples, you have a 95% probability of detecting a 9-foot diameter release within the grid spacing with one sample, at that sample's depth. So, to take a sample at a 5-foot depth at the center of a 15- by 15-foot grid cell and detect nothing, is to have a 95-percent confidence that there is no 9-foot diameter release within the 15- by 15-foot grid cell at a depth of 5 feet.</p>
<p>(iii) Page A5-1, Request for Analysis: The screening method for PCBs is 4020, no 4040. Please correct this typo.</p>	<p>Response to b (iii): According to California Regulatory Notice Register 94, Volume 27-Z, the method number for immunoassay of PCBs is U.S. EPA Method 4020. Reviewer is probably confusing this with the CLP/SOW Method 8080.</p>
<p>c. Quality Assurance Project Plan (i) Page B3-9, first paragraph: The QAPP states that "a minimum of 109 percent positives and a minimum of 5 percent of nondetects will be sent to a fixed-base CLP laboratory for confirmation." The FSP should read "15 percent of nondetects will be sent to the fixed lab. . ." Please correct this typo.</p>	<p>Response to c (I): Text has been revised to show the percentages of samples to be split for offsite analyses have been established in the decision rules discussed in Section 1.1.1 of the FSP.</p>
<p>(ii) Page B3-11, Laboratory Analytical Levels: Please edit the last sentence to read "The selection of NFESC Level D analyses requires standard CLP methods be implemented, where applicable, including VOCs, SVOCs, pesticides and PCBs, and metals." (Please note that not all analytical methods have CLP protocols.)</p>	<p>Response c (ii): Text has been revised to reflect the reviewer's comment.</p>
<p>d. Draft Investigation-Derived Waste Management Plan: Page 6, 9 paragraph 6.3.4: The text indicates that petroleum contaminated soil will be treated at the low-temperature thermal desorption unit at MCAS Tustin or will be treated at another facility. Please ensure that MCAS Tustin has approved of the use of the treatment facility for wastes generated off-station. The operator of the MCAS Tustin</p>	<p>Response d: The IDW plan will reflect the new arrangement to have the RAC contractor sharing the same staging area at MCAS El Toro as CLEAN II. No soils will be transported to Tustin.</p>

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<p>treatment facility has not been tasked with the treatment of wastes from MCAS El Toro. Please ensure that procurement for such services has been completed prior to implementation of this plan. (It should be noted that the low-temperature thermal desorption treatment facility of MCAS Tustin has not been mobilized yet, and work plans for facility operations are currently in review by the regulatory oversight agencies.)</p>	