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CONTACT REPORT

Job No. 22214 RFP X036	Date of Contact 7/6/94	Type of Contact: Telecon	Phone Call XX Bechtel Office Client Office Jobsite Other
Company Bechtel San Diego	Contact Name & Title Al Arellano Joe Zarnock Cal Dep't of Toxic Substance Control		Bechtel Name & Title Jacques Lord Sr. Environmental Scientist
Purpose of Contact: Subsequent to the Pre-Proposal Meeting for the El Toro RFI (X036; held 6/27/94), a letter of CalDTSC comments on the El Toro RFA was made available to me. The PPC attendees (J. Ashman, D. Cowser, L. Hocnecker, D. Tedaldi, J. Lord) assumed that the comments from DTSC requested that 8 SWMUs which had been recommended for no further action be included for further assessment as a condition for TDSCs approval of the RFA. It was our underlying assumption at this PPC meeting that the DTSC was on board with the Navy requesting the CLEAN II contractor to perform the next RCRA corrective action steps (i.e. to do an RFI). However, the actual comments from TDSC are significantly different from the assumptions made at the PPC on 6/27/94. The letter's text implied that the RFA was approved by TDSC so long as certain SWMUs were investigated further with the results attached as an addendum to the RFA. Therefore, I called the TDSC to get clarification on their comments.			
Results: While Al Arellano was the signature on the letter (dated 5/17/94), the author of the comments was Joe Zarnock. He informed me that he did not want to see ANY RCRA corrective actions take place because "permit-modifications take too long, are too cumbersome and inefficient a vehicle" to meet Base Closure Plan Schedules. He further commented that an RFA was performed only as a vehicle to collect Site Assessment data on the "SWMUs" since he claimed the Navy could not conduct CERCLA site assessment actions on a site that was already listed on the NPL. Essentially the RFA format was a "work-around" in an otherwise CERCLA-driven program.			
Future Action to be Taken: Since the RFP that we discussed is asking for the performance of an RFI, and this is in direct conflict with what the TDSC is looking for, I want to bring this to the attention of the El Toro RFI RPM before getting too far into the cost proposal. I would like to meet with the same group that met 6/27/94 in the PPC to reassess the proposal outline in light of the TDSC comments (attached).			
Prepared By: Jacques P. Lord 	Location: San Diego (619) 687-8700		Date: 7/7/94

Distribution:	Route	Copy	Other:	Route	Copy
J. Moe	---		D. Cowser	---	XX
J. Kluesener	---	XX	D. Tedaldi	---	XX
J. Chapman	---		J. Ashman (SWDIV)	---	XX
J. Matthews	---		L. Hoenecker (SWDIV)	---	XX
M. McKee	---			---	
R. Kown	---	XX		---	
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Originator J. P. Lord	XX			---	

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
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Revised Version

May 17, 1994

Mr. Bret Raines
BRAC Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
Code 1831.BR
1220 Pacific Highway
San Diego, California 92132-5181

Dear Mr. Raines:

**APPROVAL WITH MODIFICATIONS OF MARINE CORPS AIR STATION EL TORO,
EL TORO, CALIFORNIA, INSTALLATION RESTORATION PROGRAM, FINAL RCRA
FACILITY ASSESSMENT (RFA) REPORT**

In a letter dated January 24, 1994, the California Department of Toxic Substances Control (DTSC) indicated that it had completed its review of the subject *Final RFA Report* (Volumes I through V) dated July 16, 1993. At the time, we did not approve the *Final RFA Report* because several Solid Waste Management Units/Areas of Concern (SWMUs/AOCs) that were recommended for further action had not been incorporated into the Remedial Investigation/Feasibility Study (RI/FS) program as Operable Unit (OU)-4 or another program for corrective and/or remedial action. Moreover, DTSC recommended additional SWMUs/AOCs for further action.

Enclosed with this letter are modifications that need to be made. These modifications may be made by attaching the enclosure to the *Final RFA Report*.

DTSC hereby approves the *Final RFA Report* with the specified modifications. If you have any questions concerning this matter, please contact me at (310) 590-4920.

Sincerely,

Albert A. Arellano, Jr., P.E.
Region 4 Base Closure Unit
Office of Military Facilities

Enclosure
cc: See next page.



Mr. Raines
May 17, 1994
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cc: Mr. Andy Piszkin
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**DTSC MODIFICATIONS TO
FINAL RFA REPORT****MCAS EL TORO**

The following SWMUs/AOCs and underground storage tanks (USTs), that DTSC identified in the January 24, 1994 letter, have been incorporated into the **Base Realignment and Closure (BRAC) Cleanup Plan (BCP)** dated March 21, 1994 and recommended for further action. Please see the DTSC letter dated January 24, 1994 for additional information on these SWMUs/AOCs and USTs.

SWMUs/AOCs:

- 84 (oil/water separator [OWS] 298-C)
- 145 (UST 529 - Waste Oil)
- 151 (OWS 605-C)
- 173 (OWS 671)
- 175 (OWS 672-A)
- 176 (UST 672-B)
- 199 (OWS 759-A)
- 298 (UST 392 - Waste Oil)

USTs:

- at Tank Farms 2, 3, 5 and 6
- 240-A (removed); replaced by UST-797
- 398 (commonly known as Tank 398)

We require that the BCP be modified to address further action at the following SWMUs/AOCs (again, please see the DTSC letter dated January 24, 1994 for additional information):

- 7 (Transformer Storage Site)

The one sample location investigated during the RFA did not necessarily characterize this site.

- 9 (Fuel Bladder)

The RFA investigation provided no evidence that petroleum hydrocarbon contamination is limited to 5 feet below ground surface (bgs). Total fuel hydrocarbon (TFH)-diesel was detected at 5 feet bgs at a concentration of 414 parts per million (ppm); deeper samples were not collected. The potential for contamination at deeper depths should be investigated.

DTSC Modifications to Final RFA Report
May 17, 1994

- 244 (Polychlorinated Biphenyl [PCB] Spill Area)
The extent or absence of possible residual contamination should be confirmed.
- 267 (Drop Tank Fuel Storage Area)
This SWMU/AOC was recommended for a sampling visit in the *Draft Preliminary Review/Visual Site Inspection (PR/VSI) Report*, dated July 3, 1991, but was not sampled during the RFA investigation.
- Hazardous Waste Satellite Accumulation Areas
Decontamination and/or removal strategies (e.g., at concrete pad structures) should be evaluated.

We require that the *Tank Management Plan (TMP)*, being developed as part of base closure, address the following UST, aboveground storage tank (AST) and OWS concerns:

- 20 (UST T-C [also known as UST 414-C] - Waste JP-5)
The RFA investigation provided no evidence that petroleum hydrocarbon contamination is limited to 5 feet bgs. TPH-diesel was detected at 5 feet bgs at a concentration of 463 ppm; deeper samples were not collected. The potential for contamination at deeper depths should be investigated.
- 48 (UST 178 - Waste Oil)
The 10 foot depth sample (top sample) of angle boring A1 with a total petroleum hydrocarbon (TPH) result of 822 ppm indicates possible surficial soil contamination. At a minimum, additional analyses should consist of semivolatile organic compounds, metals and petroleum hydrocarbons.
- 65 (UST 240-B)/66 (OWS 240-C), 205 (OWS 761-A)/206 (UST 761-B), and 211 (OWS 763-A)/212 (UST 763-B)
At these three OWS systems, the OWS and UST are separated by approximately 15 to 20 feet and only one 25 foot boring, situated between the two units, was used for the RFA evaluation.

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- 129 (UST or OWS 445-C - Waste Oil)

An observed stained area identified in the *Draft PR/VSI Report* should be investigated. The stained area is approximately 4 feet in diameter and about 25 feet west of the wall of Building 445 and 12 feet south of the concrete pad surrounding the pump units.

- 231 (UST 800-E - Waste Oil)

Even though RFA sample results did not indicate contamination, additional investigation and/or removal is recommended for this UST which failed a tank test conducted in 1990.

- 260 (AST - JP-5)

The *TMP* or *BCP* should include a proposal to evaluate the large stain observed on the pavement of this former storage tank. Since the pavement was cracked at the stain area, it is possible that soil may have been impacted by releases.

We require that the *TMP* evaluate strategies for the following OWSs that apparently were not investigated in the RFA but were identified in an OWS survey report (April, 1993) prepared by Law/Crandall:

- B-658
- B-744
- 280
- 324
- 371
- 802
- 845
- 850/851
- 892
- 896
- 897
- 1702