

Site 13 EE/CA Comment Meeting
1/13/95 9:30 AM

<u>Name</u>	<u>Affiliation</u>	<u>Phone #</u>
Tim Latas	Kleinfelder	(619) 541-1145
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David Cowser	Bechtel	619-687-8803
Larry Vitale	RWQCB (by phone at 1100)	415-768-3286

InterOffice Memo**To:** Tim Latas**From:** Jason Ashman**Date:** January 5, 1995**Subject:** Advance comments from Sherrill Beard per telephone conversation of 1-5-95

1. The cost analysis needs to be more extensive. Specifically, the cost estimate needs to include dollar amounts associated with each alternative. Assumptions may need to be made to support the dollar amounts and should be clearly stated.
2. The statement "The site is characterized, the extent has been delineated" has not been agreed upon the regulatory agencies. Please correct this statement to reflect the actual situation.
3. Please provide a justification for the cleanup levels. State whether or not these levels have been agreed upon the BCT.
4. Section 3.2. indicates that there will be on site analysis of the excavated soil. This is acceptable, however, more important is the on site analysis of the excavation side walls to show that the excavation has encompassed the contamination.
5. This EE/CA has chosen thermal desorption for the clean up remedy. Please discuss how thermal desorption will be used at other sites at El Toro and Tustin.
6. ~~The BCT doesn't include the RWQCB.~~ The RWQCB is a part of CAL EPA.
7. In section 2.1. provide the data from all previous investigations at this site.
8. All references need to be very specific so that the RAB or any other people reading this document can find the appropriate information. Please limit the amount of references as much as possible.
9. 2.2.1. Other removals are mentioned, but there is no mention of where the soil from the previous removal actions was treated or stored.
10. 2.3. discusses the RBC values. Please justify these values and state if they have been approved by the BCT.
11. 2.4.1., please provide the data from all previous investigations at this site.
12. 3.2., in the second paragraph, fourth sentence the "observation method" is mentioned. Please discuss and define what this method consists of and clearly define this process.
13. The QAPP and other plans referenced in this EE/CA must be approved before this EE/CA can be executed.

CC: Sherrill Beard

the authors apparently meant to state that further data review or interpretation was not necessary.

8. On page 2-12, the text should state that it is highly unlikely that the TRPH detected at Site 13 was gasoline and gasoline will rapidly evaporate.
9. On page 3-4 the text should include reference to a table of sites with action levels of 1,000 mg/kg TRPH. USEPA's Bioremediation in the Field periodic publication is a good resource for this information.
10. On page 3-4 the text should note that the single reported value for benzo(a)pyrene was below the CRQL.
11. On page 4-2 the text should include adequate reference to the appropriate MCAS El Toro field sampling plan.
12. On page 4-2 it would appear advantageous to specify Method 8310 rather than 8270 for PAHs to ensure adequate quantitation limits,
13. The discussion of confirmatory sampling provides detail related to analytical methods, but not decision-making criteria; however this approach is apparently adequate for EE/CAs. Regardless, a note should be added that the confirmatory sampling program which may be implemented by the remediation contractor may not be equivalent.
14. Based on the cost details, the confirmatory sampling and analysis of treated soil would be equivalent to that performed on the untreated material. If this is the case, it should be stated at the end of the second to last paragraph on page 4-2.
15. On page 4-5 the text does not identify a reason why larger particles can be disposed as waste.
16. On page 4-5 the text notes that treated soil will be collected periodically and analyzed daily. There is no detail provided, see comment no. 13.
17. On page 4-5 the text notes that samples will be analyzed by a mobile lab for TRPH; however, no analyses for benzo(a)pyrene are included. Why?
18. On page 4-5 delete the sentence "On a comparative cost basis, this assumption does not invalidate the cost analysis, because all three alternatives will require the same amount of backfilling." This sentence is inappropriate because it confuses the intent of a comparative analysis with an equivalent analysis. Alternatives do not need to be equal to be compared.

memo
from

Dante J. Tedaldi

(MCAS El Toro Technical Quality Assurance)

TO: BCT Members MCAS El Toro

Bonnie Arthur US EPA

Juan Jimenez CAL EPA

Joseph Joyce SW DIV

Larry Vitale CA RWQCB

Regarding: Expedited review of EE/CA for Site 13 MCAS El Toro.

I have reviewed the subject EE/CA and find that it is acceptable with the inclusion of the following format and content changes.

1. The Executive Summary should include the cost of the recommended alternative and the duration of the project. The summary should also identify excess cancer risk equivalent to the selected benzo(a)pyrene action level.
2. The document should include a section listing the assumptions used to develop costs, e.g. explain the definition of distributables. This section should also include an estimate of the confidence/error associated with the costs.
3. On page 2-7, 2-10 and elsewhere, reference is made to PAHs; however PAH values are not described or listed in the text and tables. Apparently, the only PAH of concern at this site is benzo(a)pyrene. This should be clarified in the text.
4. For organics analyzed by CLP methods the descriptor is contract required quantitation limits, not contract required detection limits (see Table 2-8).
5. On page 2-10 the text incorrectly states that a flag of U indicates the reported concentration is equal to the detection limit. The flag of U indicates that the reported concentration is less than the detection limit.
6. On page 2-10 the text states that PAH concentrations do not exceed RBCs of 10-4 for excess cancer risk. Later in the document (bottom of page 2-11), 10-6 excess risks are identified. What is the value that is being used in this document?
7. On page 2-10 the text states that in spite of an elevated detection limit further data validation is unnecessary. While it is true that further validation is not necessary,

19. On page 4-6 the text notes that "Treatment to a TRPH concentration of 1,000 mg/kg should minimize the exposure risk to resident and workers." Explain which workers (remediation or future) and remove the word should and substitute the word will.
20. On page 4-7 and at the end of each of the three action alternatives the test should identify the actual cost of the alternative.
21. Copy the second paragraph from page 4-7 section 4.2 and insert onto page 4-9 and delete repetitive test on page 4-9 and 4-10.
22. All cost tables should include final figures rounded to the nearest \$10,000. Are we sure that there are no permitting costs? Because the number of analyses indicates a high degree of precision (e.g. 384 PAH/sample) please provide full details on these estimates, since they obviously are available in the files.
23. On page 4-11 refer to the units as bioremediation cells not soil stockpiles.
24. On page 4-11 delete the sentence "On a comparative cost basis, this assumption does not invalidate the cost analysis, because all three alternatives will require the same amount of backfilling." See comment 18.
25. On page 4-13 the text notes that "Treatment to a TRPH concentration of 1,000 mg/kg should minimize the exposure risk to resident and workers." Explain which workers (remediation or future) and remove the word should and substitute the word will.
26. On page 5-1 and elsewhere note that there are four alternatives and three action alternatives.
27. Add a summary of the actual costs to page 5-2 and note that the maximum cost difference between the action alternatives is 18 percent and the minimum difference is 4 percent. Identify the significance of these values.

Memorandum

To: Mr. Juan Jimenez **Date:** January 6, 1995
Department of Toxic Substances Control
245 West Broadway, Suite 425
Long Beach, CA 90802

From: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409
Telephone: CALNET 632-4130 Public (909) 782-4130

Subject: RWQCB COMMENTS FOR THE MARINE CORPS AIR STATION, EL TORO,
ENGINEERING EVALUATION COST ANALYSIS (EE/CA), SITE 13

We have reviewed the subject document and have the following comments to be included with the CAL/EPA formal response:

INTRODUCTION

The last sentence on page 1-1 states that the Base Closure Team (BCT) is composed of the U.S. EPA, California Environmental Protection Agency (CAL/EPA), and California Regional Water Quality Control Board (CRWQCB). The sentence sounds as if CAL/EPA and the RWQCB are being represented separately. Actually, CAL/EPA is being represented on the BCT by both the Department of Toxic Substances Control (DTSC) and the RWQCB. DTSC and the RWQCB are both members of CAL/EPA.

2.1.2 TYPE OF FACILITY AND OPERATIONAL STATUS

The second paragraph states that there are three Solid Waste Management Units within Unit 1, (Unit 1 is one of the areas covered by this report) but they will not be addressed within this scope of work. We feel that this decision should be made by the BCT. If the three sites do have similar contaminants it would be much more cost efficient to address them now rather than later. In addition, one of the three areas is an underground storage tank, which if contaminated, would likely have similar contaminants (petroleum hydrocarbons) which could be treated using the thermal desorption technology proposed for this site.

3.5 REMOVAL ACTION OBJECTIVES

One of the objectives of this removal action is to cleanup the TRPH soil contamination to the level of 1000mg/kg TRPH. We understand that this cleanup level was obtained from the Leaking Underground Fuel Tank (LUFT) manual guidelines. The LUFT manual is a guidance document and not a regulatory requirement. Please note that the potential impact on groundwater will depend upon the level of contamination and the sites hydrogeology. Since the remedial technology proposed for this site is capable of treating the TRPH soil contamination below 1000mg/kg we feel the cleanup goal should be less than 1000mg/kg TRPH. Also, if contaminated soils are left in place they should be at or below 1000mg/kg TRPH, contain no gasoline fraction, and there should be a soil attenuation capacity protective of groundwater.

4.1 ALTERNATIVE 1- ON-SITE THERMAL DESORPTION

On page 4.2, the middle of the page, it states that selected samples from each unit will be submitted for analysis. How will the samples be selected? Also, it states that the excavation will not be backfilled until the analytical results are completed. How long will the excavation be open? What if there is a problem with the analysis and the results cannot be obtained quickly?

Page 4.3 describes the thermal desorption process. What hydrocarbon compounds are most effectively destroyed by this process and which are not? What are the controlling factors/parameters for efficient operation of this treatment process (in addition to soil moisture)?

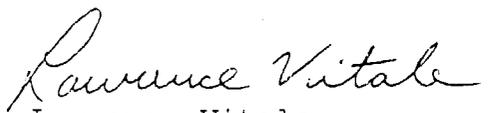
4.1.1 EFFECTIVENESS

The second paragraph on page 4-6 states that placing contaminated soil on plastic sheets and covering the piles with plastic is to control dust emissions to the air. But, in addition to controlling dust air emissions, it should be stated that the barriers are being placed also to protect ground and surface waters from infiltration or surface runoff from the contaminated soil. Any discharge to the ground of a contaminated waste (without an appropriate barrier) would constitute a Discharge of Waste to Land and require compliance with California Code of Regulations Title 23, Waters, Chapter 15, Section 2510.

SECTION 5, COMPARATIVE ANALYSIS OF REMOVAL ACTION ALTERNATIVES

Was there a preliminary screening of remedial technologies before choosing bioremediation and thermal desorption for comparison? If there was a preliminary screening of possible choices it should be included in the report so that readers may understand the logic in how the choices were made. If there was no preliminary screening, then there may be other viable treatment technologies that have not been considered and maybe a more thorough review of technologies should be done.

If you have any questions please, contact me at 909-782-4998.


Lawrence Vitale
Special Projects Section