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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 0313

IN REPLY REFERENCE: CTO-0079/0242

October 10, 1996

Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Bernard Lindsey, Code 1831.BL
Building 128
1220 Pacific Highway
San Diego, CA 92132-5187

Subject: Replacement Pages 11 and 16 (Signature Page) for Final Action Memorandum
Non-Time-Critical Removal Action for Unit 2 of Site 19 - Aircraft Expeditionary
Refueling Site

Dear Mr. Lindsey:

Attached are replacement pages 11 and 16 (signature page) for Final Action Memorandum
Non-Time-Critical Removal Action for Unit 2 of Site 19 - Aircraft Expeditionary Refueling Site.
Please replace these pages in your copy of the Action Memorandum.

If you have any questions or would like further information, please call me at (619) 687-8804.

Very truly yours,



Craig L. Carlisle
CTO-079 Leader

CLC/sp

Attachments: Pages 11 and 16



Bechtel National, Inc. Systems Engineers-Constructors

Alternative 4 is also recommended over alternatives 1, 2, and 3 because of the speed of implementability, and the fact that no handling of the contaminated material would be required. Alternative 5 is not recommended because it would not reduce the risk of exposure to the contaminated soil on-site and would not meet cleanup objectives.

1. PROPOSED ACTION DESCRIPTION

Clean soil (i.e., containing less than 1 part per million PCBs) will be used to cover the contaminated soil in the pit and backfill Unit 2 of Site 19 to a relatively level grade. Soil for backfilling the pit may not be available on the base. If imported fill is used, it will be verified to be clean and certified by the supplier to be clean. Approximately 2,460 cubic yards will be needed to backfill the excavation and all of Unit 2 to grade, assuming a 15-percent compaction factor. Use of on-site borrow material, if available, would be less costly. On-site borrow material would not be used as backfill material until analytical results indicate that the soil is clean.

2. POTENTIAL IMPACT ON SENSITIVE POPULATION AND HABITATS

Unit 2 of Site 19 is characterized by exposed soil with sparse vegetation and a pit. No special-status species were observed at this site, and the habitat provided by the immediate area for wildlife species is marginal. The proposed removal action is not expected to have an impact on any sensitive population and habitats.

3. POST-REMOVAL SITE CONTROL

The intent of the proposed removal action is to limit contaminant mobility and the potential for environmental exposure. Thus, disclosure of administrative site controls, through deed notification, may be required.

4. CONTRIBUTION TO REMEDIAL PERFORMANCE

Contaminated surface and shallow subsurface soil will be covered with clean soil thus removing the threat of current and future worker exposure to the contaminants. The toxicity, mobility, and volume of contaminants in the excavated soil will not be changed. The documented removal action will be used for site closure and will constitute part of a document for eventual land transfer.

5. DESCRIPTION OF ALTERNATIVE TECHNOLOGIES

On-site thermal desorption (alternative 1), off-site thermal desorption (alternative 2), and off-site landfill disposal (alternative 3), were also evaluated in the EE/CA (BNI 1995). For comparison, the "no action" alternative was evaluated as well, as required under the NCP. Tables 3 and 4 in Attachment B provide a summary of this evaluation based on effectiveness, implementability, and cost.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. RECOMMENDATIONS

This decision document presents the removal action for Unit 2 of Site 19 (Aircraft Expeditionary Refueling Site) selected by MCAS El Toro and developed in accordance with CERCLA as amended, and is consistent with the NCP. This decision is based on the Administrative Record for the site. The Administrative Record Index and list of information repositories is included in the Administrative Record. Conditions at these sites meet the NCP Section 300.415(b)(2) criteria for conducting a removal action and approval of this Action Memorandum is recommended. Approval of this Action Memorandum is granted by signing below.



Joseph Joyce
BRAC Environmental Coordinator
MCAS El Toro

10/3/96

Date