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MCAS EL TORO
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CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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Southwest Division
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DATE: June 25, 1997
CTO #: 0135
LOCATION: MCAS El Toro

FROM: [Signature]
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MCAS El Toro Local Redevelopment Authority (Not Dated)

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RESPONSIVENESS SUMMARY
MARINE CORPS AIR STATION - EL TORO, CALIFORNIA
PROPOSED PLAN, OPERABLE UNIT 2A, SITE 24 VADOSE ZONE

Letters Received During Public Comment Period

Comments by: Courtney Wiercioch, Program Manager, MCAS El Toro Local Redevelopment Authority, in a letter dated May 30, 1997

Number	Comments	Response
1a	The LRA is supportive of the soil vapor extraction process in removing volatile organic compounds (VOCs) at IRP Site 24. It is estimated that the extraction process will be in operation from 2 to 4 years with completion scheduled to occur subsequent to surplus property transfer to the LRA. Please provide data which substantiates the 2 to 4 year time frame. Also status reports generated during monitoring of the extraction process should include an estimated project completion date which will assist the LRA with its building reuse planning and implementation process.	The Navy is conducting soil vapor extraction (SVE) pilot tests at MCAS El Toro. The results of these tests to date support an estimated SVE system operation of 2 to 4 years. As additional data become available, the estimated time required for remediation will be refined. Remedial operation status reports will include refined project completion estimates, as appropriate. Data supporting the estimated 2 to 4 year operation of an SVE system can be found in the Remedial Investigation (RI) and Feasibility Study (FS) reports.
1b	While the LRA fully supports efforts to remediate IRP Site 24, the soil vapor extraction system should be designed and located to ensure that any proposed reuse of Buildings 296 and 297, and all other facilities in the vicinity, will not be negatively impacted. The proposed reuse of these buildings will require that all paved surfaces be clear of obstructions (e.g., system will not impede building, parking, runway or aircraft apron use). It is requested that the LRA be allowed to comment on the proposed design, for location purposes only, prior to final approval.	SVE pilot tests have been ongoing at Site 24 for approximately one year on an operating air field. Impacts to airfield operation have been minimized by coordinating with air operations personnel and designing around foreseeable problems (e.g., using flush-mounted, traffic-rated well covers). In general, busy traffic areas such as taxiways are accommodated during the design phase by using underground piping. Aboveground piping is generally installed in areas where traffic is minor or can be easily rerouted. Future land reuse will be considered during the final design of an SVE system. As with the current pilot tests, impacts to operations from future work will be limited as much as possible. The Navy will coordinate with the Local Redevelopment Authority (LRA) on this issue to the maximum extent possible. However, compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) will remain the Navy's principal obligation in the event of a conflict between remediation of the site and site reuse.

(table continues)

Responses to Public (continued)

Number	Comments	Response
1c	<p>Subsequent to the successful completion of the extraction process, it is expected that monitoring will be continued on a regular basis in accordance with existing state and federal regulations. The LRA requests assurances that monitoring will not interfere with planned reuse and that the LRA be immediately notified if any new or recurrent public safety hazard exists.</p>	<p>After successful completion of vadose zone remediation, no additional monitoring is planned as part of the vadose zone remedy. However, groundwater monitoring will continue at Site 24 and soil gas may also be monitored as part of the groundwater remedy. Monitoring activities, like remediation activities, will be carefully planned to minimize interference with site reuse. However, compliance with CERCLA will remain the Navy's principal obligation in the event of a conflict between remediation and required monitoring of the site and site reuse.</p> <p>The presence and concentrations of volatile organic compounds (VOCs) in shallow soil at Site 24 do not present a public health hazard. A risk assessment was performed for Site 24 and the potential cancer and non-cancer risks from exposure to VOCs in soil was found to be negligible. If any future public safety hazard were to arise, the Navy would notify the property owner and all appropriate agencies.</p>
1d	<p>Please confirm that subsequent to the initiation of the operation of the soil vapor extraction system (remedy), that there will be no health risks associated with excavation of the site to a depth of at least 50 feet.</p>	<p>A human-health risk assessment was conducted for Site 24. This assessment was based on three scenarios: a resident who was assumed to be exposed to soils down to 10 feet bgs, an office worker who was assumed to be exposed to soils down to 2 feet bgs, and an excavation worker exposed to soils down to 10 feet bgs for a very short time. The assessment concluded that the risk from exposure to VOCs in soil was very minor (an excess lifetime cancer risk of about 5 chances in one billion for the resident and less for the office and excavation workers). The risk assessment evaluations are addressed as part of the RI report.</p> <p>Risk assessments are not typically performed for soils below 10 feet because excavation below this depth is not common and the types of risks associated with excavation are typically acute, rather than chronic, exposures to chemicals. If the site were to be excavated to this depth, a site-specific health and safety plan would be used to manage risks. This plan would be prepared in accordance with the Occupational Safety and Health Act (OSHA) and would include such topics as shoring and use of personnel protection equipment. Monitoring would be required to prevent excessive exposure to gases such as methane (which is naturally occurring) or VOCs.</p>

(table continues)

Responses to Public (continued)

Number	Comments	Response
1e	<p>IRP Site 24 includes Buildings 296 and 297 which were previously used for metal plating, radium plating, and other aircraft related rework. Please provide information on any other non-VOC contaminants (sic) which may impact the site and/or the proposed soil vapor extraction process.</p>	<p>The Site 24 investigation was directed at VOCs. However, other Installation Restoration Program (IRP) sites were developed within the boundary of Site 24 to address non-VOC contaminants. Non-VOC contaminants at Site 24 were evaluated as part of the investigation of IRP Sites 7, 8, 9, 10, 11, and 22. The investigation findings for these sites will be summarized in separate Proposed Plans. No adverse impacts to the proposed SVE system due to the presence of these sites have been identified. Besides the IRP sites, the use and eventual closure of facilities supporting the operation of El Toro will be evaluated for non-VOC contaminants which may have an impact to surrounding soils within the boundary of Site 24. All these locations of potential environmental concern are summarized in the Base Realignment and Closure (BRAC) Cleanup Plan (BCP).</p>
1f	<p>Please confirm the LRA's understanding that subsequent to having the final remedy in place, the property associated with IRP Site 24 will be transferred to the LRA with no institutional controls or restrictions on ultimate reuse of the property.</p>	<p>During remediation of soils, the Navy plans to place restrictions on Site 24 to protect the SVE wells, associated equipment, and system monitoring. These restrictions will be removed once remediation is complete. Restrictions are also expected to be necessary to protect the groundwater remediation system. Also, as discussed in Response 1e, Site 24 also includes other IRP sites within its boundaries (e.g., IRP Sites 7, 8, 9, 10, 11, and 22). At this time, the Navy does not plan to place any institutional controls or restrictions on the IRP sites within Site 24. However, until the Proposed Plans for these sites are developed and reviewed, the Navy cannot make this confirmation.</p>